



General Contract Conditions

FOR THE 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 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 element of the activities, products or services of an Organisation that might interact with the environment (ISO 14001)
Validation certificate	the document issued to the Client by ICMQ certifying the verification and validation of the EPD
Treatment	all the actions that the Client needs to take to eliminate any Non-Conformity detected by ICMQ
Corrective Actions	all the actions that the Client needs to take to avoid a repeat in the future of a Non-Conformity detected by ICMQ
Impact category	the category used to aggregate the results of the Life Cycle Inventory and to express them in terms of potential environmental impact
Client (Organisation)	the set of individuals and means, with established responsibilities, authorities and interrelations. The term used to indicate the provider of a product and/or service requesting the validation
Certification Committee	the set of individuals who decide on whether to Issue, Maintain, Renew, Suspend or Revoke the validation
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]
Validation	the procedure whereby a third party guarantees that a product, process or service meets specific requirements
Type III Environmental Declaration (EPD)	the collection of quantified environmental data referring to a product, expressed through categories of predefined parameters, based on the 14040 series standards and other environmental information provided in a Type III Environmental Declaration program (ISO 14025)
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 $\pm 10\%$ 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 $\pm 10\%$ 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
Audit Team	the persons appointed by ICMQ to carry out the on-site verification
Life Cycle Assessment (LCA)	the compilation and assessment of inputs, outputs and potential environmental impacts of a product/service throughout its entire life cycle (ISO 14040)
Environmental impact	any change to the environment, whether adverse or beneficial, wholly or partially resulting from the activities, products or services of an Organisation (ISO 14001)
Checklist	the document prepared by ICMQ and used by ICMQ Auditors to carry out the verification
Non-Conformity	<p>the deficiencies found during audits conducted by ICMQ auditors; classified as:</p> <p><u>Major non-conformity:</u></p> <p>a deficiency in the LCA study or EPD, a systematic failure to meet a requirement of the standard of reference or a certification/validation requirement, or a failure to meet an applicable legal requirement, such as to jeopardise the integrity of the EPD and the reliability of its validation. A minor non-conformity that persists over time.</p> <p>The case cannot be submitted to the ICMQ Certification Committee for a Certification to be issued or renewed until, for each non-conformity classified as major, the effectiveness of the corrections and corrective actions taken has been verified, either at the documentary level or through an additional audit.</p> <p>Specifically, for every major non-conformity highlighted during an audit to maintain validation, the organisation must send the appropriate documentary evidence regarding the resolution for each NC to ICMQ within three months, if carrying out another audit is deemed unnecessary.</p> <p><u>Minor non-conformity</u></p> <p>a deficiency in the LCA study or EPD subject to validation that does not fall under the definition of a major non-conformity and therefore does not put the correctness of the EPD or the integrity of its validation at immediate risk.</p> <p><u>For every NC</u> the organisation must send the corrective actions regarding each NC found to ICMQ within and no later than 10 days from the verification. Before receiving this communication, it will not be possible to submit the case to the Certification Committee for the validation to be issued/renewed/extended or maintained; any longer time period will need to be authorised by ICMQ.</p>

	In reviewing the case, ICMQ may request an additional audit in order to assess the effectiveness of the corrections and corrective actions for the major non-conformities highlighted or to assess different timeframes for a resolution depending on the problem highlighted in the non-conformity itself.		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 Program Operator's GPI.
Standard	the set of requirements provided for by UNI EN ISO 14025 and the UNI EN ISO 14040 family, as well as the PCR (Product Category Rules) when present, and the Program Operator Regulations in which the EPD will be published.	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. The EPD-tool algorithm is checked by ICMQ on a periodic, biennial basis, in the same way as the first qualification and with annual sample checks just on the EPDs generated.
EPD Process	the data collection management system that allows an Organisation itself to verify the EPDs drawn up [applicable for the activities carried out for the International EPD System]		
Competent body/Program Operator	the manager of the EPD program, as defined in UNI EN ISO 14025		
Accreditation Body	the sole Accreditation Body, ACCREDIA, which operates in order to examine and check the requirements of the verifiers		
PCR – Product Category Rules	the document that describes the type of information to be provided in the Environmental Product Declaration referring to a product, starting from the life cycle analysis. PCRs also establish how the information given is generated		
Product/Service	the result of the Client's activities, which must be in accordance with pre-established specifications, which can be domestic or international technical standards, specifications agreed with the Client or used internally by them, or other identified documents. In this document, Product means the product covered by the EPD. It can also be a service (cleaning service, waste treatment service, etc.)		
Monitoring	the activity through which ICMQ periodically verifies continued compliance		
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	TOOL qualification	ways to verify EPDs that are generated from a specific calculation algorithm/TOOL [applicable for the activities carried out for EPDItaly]
		Production unit/site	the location where the activities, linked to the production of products and/or services and/or where the data is collected and implemented to generate EPDs subject to validation, are carried out
		Assessment	an action with which ICMQ verifies how the requesting Client operates to establish its compliance with the Standards

For all other definitions contained in these General Conditions, refer to the following:

- ISO 14020, Environmental Labelling: General Principles;
- ISO 14021, Environmental labels and declarations - Self-declared environmental claims (Type II environmental labelling);

- ISO 14025, Environmental labels and declarations – Type III Environmental Declarations – Principles and procedures;
- 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;
- EN 15804, Sustainability of construction works. Environmental product declarations. Core rules for the product category of construction products;
- 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 19011, Guidelines for auditing management systems;
- ISO/DIS 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.
- 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 Program 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;

2. Scope of the validation service. No advisory services

2.1. Subject of the service.

The EPD validation involves assessing the compliance:

- of the product's/service's Life Cycle Assessment (LCA) with the reference Product Category Rules (PCR) and with ISO 14025 series standards and EN 15804 for construction products.

2.2. No advisory services.

ICMQ does not provide advisory services, either itself or via sub-contractors, to help Organisations define their management systems or assess product life cycles or prepare the LCA.

3. Reference documents and technical standards

The following documents amount to applicable technical standards:

- ISO/IEC 17065 (current version) Requirements for bodies certifying products, processes and services;
- 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 (current version) “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;

- Current mandatory regulations/laws applicable to the sector and to the Standard for which validation is requested;

The following documents, which have been read and approved, are also reference documents:

- a) the Rates Table in effect for the Validation;
- b) the validation request and attachments (where applicable);
- c) these General Contract 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 periodically check, at least every six months, on the site www.icmq.org (reserved area), whether the aforementioned documents have been modified with regard to that signed when the Validation Request was made, and, in any case, before each renewal.

4. Impartiality Committee

An Impartiality Committee, appointed by the ICMQ Board of Directors, representing all the parties interested in the validation, and operating according to a specific procedure, ensures ongoing impartiality throughout the validation process.

5. Contract duration

The validation contract is formalised on the date on which ICMQ receives the validation request, with the documents related or referred to it signed and accepted.

The EPD validation contract expires on the expiry date of the ICMQ validation certificate which was issued (which coincides with the EPD expiry date, as defined by the Program Operator). An EPD remains valid for 5 (five) years from the date of the Verification Report.

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 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 expire 1 (one) year after being formalised if, for reasons of force majeure that are not attributable to ICMQ, the Validation Certificate or the Qualification Certificate for the TOOL cannot be issued to the Client within this term, except where otherwise agreed in writing between the parties to govern a possible extension to the contract. In this case, the Client cannot claim a reimbursement for the sums paid, and shall pay ICMQ all the fees due for the services provided by ICMQ, 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.

NOTE: should the versions of the new regulations (EPDItaly or International EPD System) be published, this does not affect the validity of the EPDs already published, which will remain published with the same validity data as before and consequently on the validity of the certificates. The surveillance of EPDs during their validity is based on the same version of PCR and Rules used for the verification of the original EPD.

The expiry of a new ICMQ Validation Certificate, during the transition period from a Regulation or PCR to a new one, will coincide with the 5 (five) years from the date of the Verification Report, i.e. from the end of a transition period.

6. Parties involved

The Organisation prepares the EPD environmental declaration of a product on the basis of the LCA study, referring to the documents listed under article 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.

ICMQ is the independent third party that must validate the steps taken by organisations, so as to ensure the accuracy of the information contained in the life cycle analysis and any EPD environmental declaration.

The Accreditation Body supervises, verifies and monitors the bodies that are engaged in the application of the EPD environmental declaration's validation, maintenance and renewal systems. 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 Program Operator:

- defines and approves PCRs;
- spreads information on the EPD system;
- records and publishes EPDs validated by ICMQ.

7. ICMQ's obligations

The Assessment will be carried out by ICMQ, to validate the EPD, in relation to the product for which the Client has requested validation, acting with a reasonable standard of care. The assessment will be carried out with the utmost independence and impartiality. ICMQ's obligation, in relation to its validation work, is to provide a service and not to achieve an objective. Therefore, ICMQ can only issue the validation certificate when the documents prepared by the Client comply with the Standard and when there is objective evidence supporting the values declared in the EPD environmental declaration.

ICMQ is in no way responsible and neither does it account for any third-party rejection of the validation or for any claim for damages/amounts or compensation for failing to meet

expectations relating to validation.

7.1. EPD compliance verification method

ICMQ verifies EPD compliance by referring to the requirements expressed in the Standard, and in the standards/technical regulations, of reference.

There are two cases:

- 1) Verifying EPDs generated through the use of a qualified Tool: the EPD is generated through the use of an EPD-TOOL or LCA TOOL algorithm (Tool) for publication in the EPDItaly program;
- 2) Verifying EPDs generated without the use of a Tool (standard verification) for publication in the EPDItaly program and/or the International EPD System.

The requirements for validating EPDs subject to ICMQ verification are different depending on whether it is an initial/renewal validation activity or a monitoring activity.

7.1.1. Requirements for verifying EPDs generated through the use of a qualified tool for publication in the EPDItaly program.

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

1) LCA-TOOL: if an Organisation develops different EPDs, using the same calculation modelling (algorithm/TOOL), verification can be optimised by a process to qualify the algorithm used and the subsequent verification of its correct use for the specific EPD.

In fact, the calculation algorithm, based on the same LCA model, allows the different impacts of products to be determined as the input data varies. After the first EPD has been verified, verifying later ones is simplified since the previously validated calculation model need not be verified every time.

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 validation certificate is issued, in the name of the EPD owner, that identifies the boundaries and scope of all the EPDs that can be produced by the qualified EPD-tool, if verified at the initial qualification stage. This certificate, which is valid for two years, is subject to renewal, through verification of the tool, as indicated in paragraph 12.9 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 TOOL used to generate them.

7.1.1.1 Requirements for validating EPDs generated by an 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) Specific requirements for validating the EPD;

7.1.1.1.1 Use of a qualified LCA-TOOL

The qualification includes ICMQ's verification activities to confirm the following:

- the LCA-TOOL's compliance with regard to the field of application defined according to the following elements: the reference PCR, product type, life cycle modules implemented, production units, type of any additional environmental parameters, any specifications and identified application limitations;
- the LCA model's compliance with the PCR;
- compliance with the ISO 14040/EN 15804 series

- standards (for construction products);
- compliance with EPDItaly's general instructions;
- that the assessment of the data includes coverage, accuracy, completeness, representativeness, consistency, reproducibility, sources and uncertainty;
- the plausibility, quality and accuracy of LCA-based data;
- the quality and accuracy of the additional environmental information;
- the quality and accuracy of the supporting information;
- the non-modifiability of the LCA model structure with the data inventory variation;
- the non-modifiability of impact indicators;
- the ability to enter primary data only;
- the availability of a descriptive report on the LCA model developed, accompanied by use examples.

If the LCA-TOOL used by the Organisation has already been qualified by ICMQ, the ICMQ auditor will only verify the compliance of the qualified version of the LCA-TOOL and the validity of its qualification certificate.

If the LCA-TOOL used by the Organisation has not already been qualified by ICMQ, it needs to be preliminarily qualified, as indicated in paragraph 7.1.1.3.

7.1.1.1.2 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 Program 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 is done with the first EPD generated by the LCA-TOOL, and typically when the tool itself is being used.

The Organisation that uses an LCA-TOOL to develop EPDs (as the EPD Owner), must, on an annual basis, send ICMQ a communication regarding the permanence of the requirements regarding the correct application of the processes in the use of the LCA-TOOL.

In the event of a change in these aspects, ICMQ will perform these verifications again so that the EPDs produced by the Organisation can be validated.

If the checks carried out on these aspects are negative, it will not

be possible to proceed with validating EPDs generated by the LCA-TOOL.

7.1.1.1.3 Verifying legislative compliance

The provisions of paragraph 7.1.2.1, below, apply.

7.1.1.1.4 Specific requirements for validating the EPD

There are two cases:

- The first EPD generated using a qualified LCA-TOOL;
- The EPD following the first one generated using a qualified LCA-TOOL;

7.1.1.1.4.1 The first EPD generated using a qualified LCA-TOOL

The validation activities for the first EPD produced by a qualified TOOL are specified in paragraph 12, below. 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 activity must be performed for each new EPD that presents elements from the LCA-TOOL's field of application which are different from those contained in previously validated EPDs (e.g. different product types, life cycle modules, production units).

Having completed the EPD verification and validation activities, ICMQ will issue a specific validation certificate.

7.1.1.1.4.2 The EPD following the first one generated using a qualified LCA-TOOL

Since the LCA model has already been verified, EPDs can be verified with an optimised procedure, without the need to further verify the LCA model.

ICMQ must verify each EPD issued by the Organisation, in terms of the EPD's correct layout in accordance with the format defined by the Program Operator and consistency of the input data.

Data consistency can be checked with the help of a plausibility check prepared by the Organisation and/or by checking the data that is more significant, depending on the verifier's choice (e.g. mass balance, difference with past primary data, difference with past impacts, etc.).

For each EPD, the Organisation's legal representative must declare:

- that the environmental impacts have been calculated using a calculation algorithm, appropriate identification of which must be provided to EPDItaly;
- that the selection of inventory data is limited and specified in the Report (where required by the TOOL);
- that the correct process in the use of the tool has not changed and that certain defined means have been adopted to prevent the operator from changing the calculation algorithm and/or the LCA calculation model;
- that the data used is the actual data.

The Organisation must also make available to ICMQ, for each EPD produced:

- the data input into the calculation algorithm;
- the mass and energy balance, where it is possible to extrapolate it from the TOOL;
- the plausibility check (if provided) and/or significant data requested by the verifier;
- the output report from the calculation algorithm, where required by the TOOL.

For each 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;
- primary data quality requirements.

Having completed the EPD verification and validation activities, ICMQ will issue a validation certificate.

The Plausibility Check represents a control document regarding the consistency of the input and output data that are more significant (e.g. mass balance, difference with past primary data, difference with past impacts, others to be chosen by the verifier).

If the EPDs, following the first one, contain the same additional Environmental Parameters, verified with the validation of the first EPD or produced directly by the qualified tool, ICMQ will check that the legal representative declares:

- that the same reference was used for the calculation (procedure, spreadsheet, qualified tool, etc...);
- that any test results refer to a test report that has already been verified and is valid (usually 5 years);

7.1.1.2 Requirements for validating EPDs generated by an EPD-TOOL

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.

7.1.1.2.1 Use of a qualified EPD-TOOL

The qualification includes ICMQ's verification activities to confirm the following:

- the EPD-TOOL complies with the scope defined according to the following elements: the reference PCR, product type, life cycle modules implemented, production units, type of any additional environmental parameters, any specifications and identified application limitations, component elements database version;
- the LCA model's compliance with the PCR;
- compliance with the ISO 14040/EN 15804 series standards (for construction products);
- compliance with EPDItaly's general instructions;
- that the assessment of the data includes coverage, accuracy, completeness, representativeness, consistency, reproducibility, sources and uncertainty;
- the plausibility, quality and accuracy of LCA-based data;
- the quality and accuracy of the additional environmental information;
- the quality and accuracy of the supporting information;
- the quality and accuracy and correctness of the input information;
- the non-modifiability of the LCA model structure with the data inventory variation;
- the non-modifiability of impact indicators;
- the availability of a descriptive report on the LCA model developed, accompanied by use examples.

If the EPD-TOOL used by the Organisation has already been qualified by ICMQ, the ICMQ auditor will only verify the compliance of the qualified version of the LCA-TOOL and the validity of its qualification certificate.

If the EPD-TOOL used by the Organisation has not already been qualified by ICMQ, it needs to be preliminarily qualified, as indicated in paragraph 7.1.1.3.

7.1.1.2.2. 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 the EPD Owner), must, on an annual basis, send ICMQ a communication regarding the continued user training requirements on the correct use of the EPD-TOOL.

In the event of a change in these aspects, ICMQ will perform these verifications again so that the EPDs produced by the Organisation can be validated.

If the checks carried out on these aspects are negative, it will not be possible to proceed with validating EPDs generated by the LCA-TOOL.

7.1.1.2.3. Verifying legislative compliance

The provisions of paragraph 7.1.2.1, below, apply.

7.1.1.3 Method to qualify the LCA-Tool or EPD-Tool;

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, during the TOOL qualification activity, the ICMQ auditor discovers that not every requirement has been fully met, ICMQ will inform the organisation (manufacturer/software house) and request that the deficiencies found and the causes that generated them be resolved. ICMQ reserves the right to perform additional verifications.

7.1.1.3.1 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 Program 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 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.).

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.

7.1.1.3.2 Final LCA-TOOL qualification

In qualifying the LCA-TOOL ICMQ needs to verify the TOOL's compliance with the requirements indicated in paragraph 7.1.1.1.3.4.

In addition, ICMQ also needs to perform the validation activity on the first EPD generated by the LCA-TOOL indicated in paragraph 7.1.1.1.4.1. 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 LCA-TOOL qualification issued by ICMQ will only refer to those elements of the LCA-TOOL's field of application for which the validation of a related EPD could be carried out.

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

7.1.1.3.3 Final EPD-TOOL qualification

In qualifying the EPD-TOOL, ICMQ needs to verify the TOOL's compliance with the requirements indicated in paragraph 7.1.1.1.3.4.

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 the EPD-TOOL's 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.

7.1.1.3.4 Requirements for qualifying a TOOL

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

- completeness;
- correctness;
- appropriateness;
- security;
- 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.

7.1.1.3.5 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;
- The product description
- The system boundaries
- The power mix
- The cut-off rules and input data
- The product level scenarios
- The process and I/O flow modelling
- The environmental indicators used
- The 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.

7.1.1.3.6 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 Non-Conformity will be issued.

7.1.1.3.7 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:

- that 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;
- 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 Non-Conformity will be issued.

NOTE: In the case of audit on the LCA tool, 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.

7.1.1.3.8 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 Non-Conformity will be issued.

7.1.1.3.9 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 Non-Conformity will be issued.

7.1.1.4 Re-qualifying the tool

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

- Having the owner of the tool send the document (tool manual/report) indicating the changes made to the new version of the tool, compared to the previous one, to ICMQ. To facilitate the verification work, these changes need to be highlighted in the text of the document;
- Having ICMQ verify the changes made to the tool, by analysing the document sent and performing an audit (even remotely) related to the operation of the tool itself;
- Having the auditor send the result of the verification to ICMQ. This is then brought to the attention of the Certification 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, in addition to the tool name, the model version. To this end, the tool identification, which will allow it to be recognised during the verification process, will be of the form "Tool_model_version name".

Any further information about the DB or Service Pack version used can be inserted at the owner's discretion in the tool identifier to keep track of this information, respecting the following form, "Tool_model_version_name [e.g. GABI or SIMA PRO Database version] [Service Pack version]".

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.

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

Definition of the objective and field of application

- Choice of functional unit;
- Inventory

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

Data assessment

- 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.

7.1.2. Requirements for verifying an EPD generated without the use of a Tool (standard verification)

The requirements subject to verification are:

- a) The Organisation's legislative compliance with the use of the LCA-TOOL;
- b) Specific requirements for validating the EPD;

7.1.2.1. Special requirements for legislative compliance

For EPDs to be validated for publication in the International EPD System program, ICMQ's verifies the legislative compliance of the production site(s) related to the EPD in one of the following ways:

- with the presence of a valid ISO 14001 environmental management system certificate;
- in the absence of a valid certificate referred to in the previous point, with a specific on-site verification activity to check the compliance of the Organisation's production site, cited in the EPD, with environmental regulations. If the site is not sampled for audit purposes (in the case of a sector EPD or average EPD), a self-declaration needs to be obtained stating the Organisation's legislative compliance (in a format prepared by ICMQ) and signed by the Organisation's duly empowered representative.

For EPDs to be validated for publication in the EPDItaly program, ICMQ does not verify the legislative compliance of the production site(s) related to the EPD. This is the sole responsibility of the Organisation.

- ICMQ requires the Organisation to make a self-declaration of the product's legislative compliance (in a format prepared by ICMQ) and signed by the Organisation's duly empowered representative.
- Only if the legislative compliance verification activity is explicitly requested by the Organisation, will it be carried out by ICMQ with a specific on-site verification activity to check the compliance of the product covered by the EPD with environmental regulations. In this case, this activity (which is voluntary) will be indicated on the EPD's validation certificate.

7.1.2.2. Specific requirements for validating the EPD

The independent documentary verification of data from the LCA, LCI and information forms, as well as additional environmental information, must confirm the following:

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

The independent EPD verification procedure carried out on-site

must be appropriate to determine whether the Type III Environmental Declaration has been prepared in accordance with:

- ISO 14020 and the relevant requirements in ISO 14025;
- EPDItaly's and International EPD System general instructions;
- the reference PCR.

Issuing or maintaining a validation certificate does not constitute a guarantee by ICMQ of the Client's compliance with its statutory obligations.

The Client 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 client's expectations and those of any third party in general, excluding any liability towards, or guarantee by, ICMQ.

Therefore, the lack of non-conformities does not rule out the presence of non-conformities in the validation itself.

7.1.2.3. Additional specific requirements for EPD validation published by the International EPD System

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.

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.

7.1.3. Special requirements for the EPD Process

All the checks for the "EPD Process" are always done at the organisation's site where the system operates. For this type of verification, ICMQ will prepare a three-year verification plan (five-year in the case of construction products) in order to maintain and renew certification.

7.2. ICMQ Auditor

ICMQ undertakes to assign the assessment only to previously-qualified Auditors, chosen for their validation and certification experience and for their technical expertise in relation to the products and services for which the Client has requested validation, as well as on the basis of the requirements set out by ICMQ.

Audit Teams may consist of "single auditors" or "several auditors"; the Audit Team member who is appointed to coordinate and direct audits is the "Coordinating Auditor" and is the person who liaises with the Client who will receive the audit results.

For the assessment, ICMQ may assign the audit to its employees or may outsource it to contractors acting 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 will give the Client the details of the Auditors appointed to carry out the audit.

Within 5 calendar days, the Client may refuse one or more of the Auditors proposed by ICMQ. Reasons must be given in writing though. If the reasons are valid, ICMQ will propose new Auditors.

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

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

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. Corporate secrets - Confidentiality

All data and news concerning the Client, of which ICMQ might become aware in the performance of the services covered by these General Conditions, are confidential. Access thereto is governed by a specific ICMQ procedure that imposes a confidentiality obligation on Auditors and on the ICMQ staff engaged in the validation process.

Personnel from the Accreditation Body who, as part of issuing or maintaining ICMQ accreditation, become aware of information concerning the certified Client or the Client being certified, whether from ICMQ or directly from the Client's facilities, are equally bound by 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. Requirements for EPD validation certificates

ICMQ can only issue the product and sector EPD validation certificate if the LCA study and the EPD environmental declaration prepared by the Client complies with the Standard and any PCRs (where applicable) and the objective evidence made available confirms the values contained in the declaration itself.

The validation certificate is issued for each EPD and will contain references to all and only those products included in the verified and validated EPD.

The sector EPD validation certificate will indicate all the Organisations/sites that participated in the data collection.

The validation certificate will indicate the CPC codes for which it has been verified that the organisation possesses the sector skills. Alternatively, ICMQ may indicate the PCRs in the Certificate, in relation to which the organisation has developed the verified EPDs.

ICMQ may only issue the EPD validation certificate (both product and sector) generated by a TOOL if the LCA/EPD-TOOL has been previously qualified and when the verifications referred to in paragraph 7.1.1, above, have been positively completed.

The EPD validation certificate is in the name of the EPD Owner.

Only in the case of an EPD-TOOL is a validation certificate issued which identifies all the possible configurations of the product(s) for which an EPD may 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 demonstrates that the Organisation's control system for the data collection process complies with the GPI and that the EPDs drawn up comply with the requirements of the applicable Standard and PCR.

Issuing a validation certificate or an EPD Process certificate, does not require ICMQ to verify the product's compliance with a technical specification; this compliance assessment remains the Client's exclusive responsibility.

ICMQ can only issue the "EPD Process" certificate to the Client if the following have been positively verified:

- a. the Organisation's ability to draw up an LCA in accordance with the reference PCR;
- b. the procedures put in place to collect data
- c. at least one EPD drawn up by the Organisation in compliance with ISO 14025 and the reference PCR, in accordance with the procedures described in paragraph 7.1.

7.4.3. Special requirements for TOOL qualification certificates

ICMQ can issue the Qualification Certificate for a TOOL (LCA/EPD-TOOL) when the checks referred to in paragraph 7.1.1.3, above, have been positively completed.

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 to Liability

ICMQ is expressly exempted from liability:

- a) For its assessment of the EPD prepared by the Client 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 affecting products/services supplied by the Client to third parties, including issues related to product liability;
- c) For the Client's correct performance of the activity and the Client's 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) Of the requests and publication of the EDP verified on the site of the International EPD System program operator.

8. EPD Digitalization

ICMQ, manager of the EPDItaly Program digitizes the environmental data deriving from the EPDs compliant with EN 15804, validated and published in the EPDItaly Program, as part of an international agreement agreed in the Eco Platform.

The digitization process involves the possibility of sharing not only the environmental data, but also the other information contained in the EPD documentation, published on the website www.epditaly.it, in a machine-readable format. If some information required for digitization is not present on the EPD validated by ICMQ, this will be specifically requested by ICMQ itself, before publication on EPDItaly.

The digital format allows easy reading and re-processing of data by the LCA calculation programs, thus allowing the optimization of the EPD information sharing.

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

The responsibility for the data present in the digitized EPDs however is of the Organization (as EPD Owner), which, moreover, holds the exclusive right to modify them.

9. The Client's obligations

9.1. Delivery of contractual documents

The Client has the obligation to submit all the documents provided for in the validation contract and which concern the verification and validation of the EPD to ICMQ at least 15 days prior to the date set for the initial verification, unless otherwise agreed between the parties. Non-delivery or partial delivery of these documents will prevent ICMQ from starting the certification procedure.

9.2. Obligation to cooperate and safety at work during the

audit

The Client is required to provide its full cooperation to ICMQ for any on-site audit and, specifically:

- a) it will ensure the Auditors' access to the premises (its own or a third party's) where the work related to the products covered by the EPD verification and validation, notifying the same, before such access, of any specific risks pertinent to the environment in which the ICMQ Auditors are to be operating and the prevention and emergency measures adopted in relation to the activities in addition to providing the ICMQ Auditors with all the necessary Personal Protective Equipment in compliance with applicable laws regarding safety in the workplace;
- b) it will ensure access to any information (including documents) required for the Assessment, ensuring its completeness and accuracy;
- c) it will ensure the presence of necessary staff;
- d) if the Client wants their own external consultant to participate in the audits, it will ask ICMQ for authorisation. Any such consultant may assist in the audits only as an observer and cannot interfere.

The obligations cited above also apply:

- to any auditors from an Accreditation and/or Qualification Body who are engaged in activities related to maintaining accreditation and/or ICMQ qualification, and who the Client is required to accommodate whenever required.
- to any observers of the audits, sent by ICMQ to monitor its Auditors or to train the observers themselves, and who the Client is required to accommodate whenever required.

9.3. Obligation to maintain compliance.

The Client undertakes to comply with, and to remain compliant with, all the mandatory international, domestic and local requirements (laws, regulations, etc.), which apply to its products and services covered by the validated EPD environmental declaration and to the sites where they are produced.

The Client commits to maintaining its validated EPD environmental declaration compliant with the requirements set out in the Standard for the Certificate's entire period of validity. The certified Client must identify the Corrective Actions required to avoid any breach of the Standards promptly.

After obtaining the validation certificate the Client undertakes to request its publication from the Program Operator.

9.4. Changes to products, services, processes subject to verification and validation. Client-related changes. Prejudicial events

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

The Client who has obtained verification and validation of an EPD has the obligation to communicate to ICMQ:

- a) any substantial changes to the product (materials, dimensions, etc.) with a potential variation of the validated EPD;
- b) any substantial process changes (internal to the organisation or supplier) with a potential variation of the validated EPD;
- c) any changes in the TOOL/calculation model of the environmental impacts (when used - see 7.1.1.);
- d) any other change (including in input data) that produces more than a 10% change in the environmental performance of the product;
- e) any inclusion of additional environmental parameters to the EPD.

The EPD owner may make editorial changes that do not alter the meaning of the document without these needing verifications.

The Client must accept ICMQ's decision, whether ICMQ deems a new (documentary and/or on-site) assessment sufficient or whether it requires, instead, a new validation request.

If an updated LCA study identifies better environmental performance values compared to those in the already validated EPD, and the Client plans to modify the EPD declaration, the values must be communicated in writing to ICMQ, which will perform a supplemental documentary and/or on-site verification.

For all other situations see paragraph 12.6 and following.

In any case, the organisation cannot change the validated declaration without notifying ICMQ.

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 reviewed and verified. An EPD must be reviewed and updated where necessary to adapt its content to technological changes or other circumstances that might affect its content and accuracy.

If the EPD is not modified, it will remain published until its natural expiry date, without further verification by the Certification Body.

If the result of the verifications demonstrates that the modifications comply with the requirements of the Standard without the need for further on-site verification, ICMQ will communicate this to the Client. If, however, on-site verification is necessary, it will be done, with the Client bearing the costs, by following the procedure indicated in these General Conditions.

B) Client-related changes. In the event that changes occur (or are about to occur) with respect to the Client, 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 review and/or a new verification and/or a new Certification Request, with the Client, who undertakes to accept this decision, bearing the costs;
- b) Non-relevant changes: purely by way of example and not limited to: change of name or company name, change of legal form (e.g. from, for example, a general partnership to a limited liability company (an Italian S.n.c. to an Italian S.r.l.)), change of registered office address, change of VAT number, etc. In all these cases ICMQ will issue a new validation certificate containing the required changes, with the Client bearing the costs.

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

9.5. Obligation to pay

The Client undertakes to pay the amounts due (rates, fees and any other expense) for the services provided by ICMQ, even if the Validation Certificate is not issued for non-compliance of the conditions of compliance, as verified and objectively documented. In fact, ICMQ fully performs its services both in the case of issuance and non-issuance of the Validation Certificate, and cannot have its payment depend on a fact that is independent thereof.

The Client is required to abide by the terms of payment and the applicable rates at the time when the services are performed, as indicated in the Rates Table in effect. Annual changes in rates are announced by publishing the Rates Table in the reserved area of the ICMQ website.

The Client is required to pay the fee to maintain the Certificate by and no later than 31 January every year.

In the case of a late payment, the Client will pay ICMQ default interest, in compliance with Italian Legislative Decree 231/2002, and any legal fees related to debt collection.

The Client will pay ICMQ the fees for examining/accepting the Validation Request and the certification registration, for issuing the validation certificate and the certificate maintaining the validation to be issued in accordance with the Rates Table and under the terms of payment specified therein, except as otherwise

agreed in writing between the parties.

The aforementioned fees include the costs for ICMQ to manage the validation file, but do not include the fees (and the reimbursement of out-of-pocket expenses) corresponding to the audits that will be charged in accordance with the estimate which was accepted by the Client and, in the case of items not included in the estimate, in accordance with the Rates Table in effect at the time of the audit.

As for the rates for a supplementary audit and for a Validation Certificate to be re-issued, as well as for any other service provided by ICMQ, reference will be made to the Rates Table in effect at the time of such a request.

9.6. Interrupting the audit

Should a scheduled audit not start or be interrupted for reasons attributable to the Client (such as, for example, failure to provide objective evidence supporting the EPD, non-availability of the Client's staff involved in the audit, etc.), the Client is, nonetheless, required to pay ICMQ the total cost for the auditor, including expenses.

9.7. Obligation to manage complaints

The Client must:

- a) keep a record of all the complaints of which the Client has knowledge relating to the EPD declaration;
- b) take appropriate action in response to such complaints or any shortcomings found in the products or services falling within the validation certificate's field of application;
- 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 point 7.2, the choice of auditors may not be challenged.

10. EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate

The EPD validation certificate (product or sector), the EPD Process certificate (see 12.7), and the TOOL qualification certificate demonstrate that the verification conducted by ICMQ, relating to the subject of the certificate, has been performed in compliance with the requirements set by the Standard of reference, and that there is, and has been verified, sufficient objective evidence to ensure the credibility and reliability of the requirements identified. For further details on the certificates see paragraph 7.4.

11. Instructions regarding the validation request

Any organisation that works with suppliers of goods and services may request an EPD validation.

Before starting the validation activities, ICMQ issues a quote based on the information provided by the Client.

The Client must submit a Validation Request to ICMQ, with which the Client accepts the quote and the documents related to or referred by it.

ICMQ may ask for further information and/or documents to complete the request.

ICMQ then starts the EPD verification process and notifies the Client of the details of the auditors making up the assessment team.

12. Procedure for verifying and issuing an EPD Validation Certificate/EPD Process Certificate

The process to verify and issue a validation/certification includes the following main phases:

- verifying the validation request's completeness;
- confirming that the validation/certification process has started and that the auditors have been appointed;
- (if employed) qualifying the TOOL to generate EPDs;
- documentary verification;
- performing the on-site verification;
- assessing the audit outcome;

- supplementary audits, if any;
- possibly issuing the Validation Certificate/EPD Process Certificate;
- registering the validation;
- maintaining the validation/certification;
- renewing the validation/certification;
- supplementary and/or extraordinary audits, if any.

The verification activities must, at least, provide sufficient data and information to assess the EPD and to verify the reliability of the data collection, processing and control systems.

Specifically, ICMQ verifies the provisions of ISO 14025 and contained in paragraph 7.1.

The verification and validation elements are collected on the basis of the specific Checklists and Application Guides, where applicable.

12.1. Verifying the completeness of the EPD certification request/EPD Process certification request, confirming the start of the process and that the auditors have been appointed

ICMQ, after verifying the completeness of the documents attached to the Validation Request, including these General Conditions, duly countersigned by way of acceptance, and the payment of the amount due by virtue of the Validation Request, will confirm with the Client that the validation process has started and that the auditors have been appointed to perform the verifications. In the case of an average EPD or a sector EPD or an EPD Process (if this applies to multiple production sites), ICMQ will define a three-year sampling plan (five-year in the case of construction products) that will take account of:

- the number of sites covered by the validation request;
- the complexity of the production processes covered by the validation request;
- environmental issues connected with the production processes covered by the 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.).

12.2. Qualifying the TOOL to generate EPDs

See paragraph 7.1.1.

12.3. Documentary verification

The coordinating auditor, and/or other members of the Audit Team appointed by the same, perform documentary verification in order to evaluate the LCA analysis in terms of completeness and correctness, in compliance with the requirements of the Standard of reference and the PCR, where present.

The documentary verification report differentiates any Non-Conformity (NC) in the LCA study by highlighting which deficiencies are classified as critical and must be resolved prior to any further verification activities and which are less critical and can be resolved prior to the completion of the verification process. The incomplete resolution of the major NCs is an obstacle to the continuation of the verification.

Any issues discovered in this way are reported to the organisation, which is urged to submit adequate documents.

The assessment of these documents is generally done by ICMQ before any on-site verification; the date of the on-site audit is established jointly between the organisation and the Auditor and/or ICMQ.

All the EPDs are examined in the case of a product EPD or a sector EPD.

For the EPD Process, if the Management System covered by the validation has generated more than one EPD then sampling is carried out. The extent of the sample is defined by ICMQ in the light of:

- the number of EPDs available;
- the level of complexity of the processes related to the production activities covered by the EPDs;
- any differences between the products covered by the EPDs.

12.4. On-site verification

The verification stage done on-site and/or done at the data collection centre is aimed at verifying that the data used in the LCA study that fed the EPD is true and that the model adopted in the LCA is actually representative of reality, whether it is implemented in the TOOL or not.

In the event that a service is covered by the EPD, 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 (audit) will be made explicit in the service offer sent to the Client.

In fact, during the assessment stage, at least one product EPD prepared by the Organisation needs to be present. The audit is conducted by ICMQ using auditors who have demonstrated independence and competence.

The activity consists of an independent third-party sample audit of the data of all the Organisation's EPDs, as specified in point 7.1.

As far as environmental legislation is concerned, the manufacturer is solely responsible for the product's compliance with the legislation applicable to it. How this is verified is detailed in the Program Operator's Regulations.

The verification procedure for a sector EPD follows that specified in 7.1.

On-site audits shall be done with at least 5 days' notice. If the Organisation denies access to the Auditors, without valid reason, the validation will be suspended and the suspension will be communicated to the Competent Body

The Organisation must ensure that:

- ICMQ auditors are given access to all the areas;
- all relevant documents and records are available to the Auditors;
- the Auditors are assisted during their audit, also with any logistical support.

The operational stage of the on-site audit:

- is preceded by an initial meeting in which the coordinating auditor presents the audit team, explains the audit method and provides any explanations and clarifications;
- this is followed by a final meeting in which the coordinating auditor presents the results of the audit and his/her conclusions. All the comments recorded by the audit group, either as recommendations or notices of non-conformity, are reviewed together with the organisation manager who acknowledges the minutes by signing them and who is allowed, in any case, to express his/her reservations on such comments. The Organisation is given the recording forms relating to recommendations and notices of non-conformity, as well as the minutes of the final meeting.

Both meetings must be attended by the organisation's executive representatives and by those responsible for the LCA analysis, or people delegated by them.

The coordinating auditor then sends the same documents issued to the Organisation to ICMQ as well as other information on the audit. Based on this information, ICMQ decides whether or not to confirm the auditor's conclusions in writing to the Organisation.

The organisation is asked to submit, within 10 days from completing the audit, its proposals for resolving any non-conformities and the corrective actions for any non-conformities to ICMQ; validation cannot be issued until all cases of non-conformity are resolved.

12.5. Assessing the verification results and issuing an EPD Validation Certificate/EPD Process Certificate, publication of EPD

A) ICMQ examination. ICMQ examines the verification report and decides whether to confirm the outcome of the verification activity to the Organisation. ICMQ may decide to carry out a supplementary audit, consisting of a documentary audit or a supplementary on-site visit, before submitting the case to the Certification Committee.

The case cannot be presented to grant a validation until evidence has been given, at a documentary level or through a

supplementary audit, of the effectiveness of the corrections and corrective actions for each major non-conformity.

If the major NCs are not resolved and the reasons given by the Organisation are not considered satisfactory, the case for validation is not brought to the attention of the Certification Committee and, therefore, the corresponding certificate is not issued.

B) Certification Committee examination. The Certification Committee examines the case and gives its opinion on whether to issue the Validation Certificate.

A supplementary assessment can be requested by the Certification Committee. Where deemed useful, the Certification Committee may contact the Client before giving its final opinion.

Whether to issue a Validation Certificate or not is decided by the Certification Committee and the Client is notified.

The Certification Committee's decision is communicated to the Client and,

- a) if positive, a certificate is issued referring to the analysis of the EPD covered by the verification and the reference PCR, if any. Once a validation certificate has been issued, ICMQ enters the Client in a specific Registry. This Registry is published and/or publicised as established by ICMQ. In addition, information on the validation certificate can be sent, where required, to those entitled to receive it.
- b) if negative, the validation certificate is not issued and the Client is given details as to how the validation process can proceed (for instance, with a supplementary visit).

The Client may appeal the ICMQ/Certification Committee's decision in accordance with article 22 of these General Conditions.

C) Verification of the validated EPD publication. Following the granting of certification by the Certification Committee and within two months of the same, ICMQ carries out a systematic check of the publication on the Program Operator's website of the version of the validated EPD document.

In the event that the check reveals that the EPD is not published, ICMQ will evaluate any actions to be taken in relation to the validity of the ICMQ certificate.

12.6. Periodic checks to maintain the EPD validation

As regards the annual maintenance stage of the validation certificate for EPDs generated by the Tool or not, verification activities may be carried out through documentation and/or through an on-site visit. The audit method chosen by ICMQ depends on the type of EPD and/or the type of change to the impact indicators and any changes to the processes for the correct use of the Tool

The following applies to EPDs generated by an LCA-Tool or not generated by a Tool. For EPDs generated by an EPD-TOOL see paragraph 12.6.3.

An EPD must be reviewed and updated where necessary to adapt its content to technological changes or other circumstances that might affect its content and accuracy, in particular, in the case in which the individual EPD has at least one of the following:

- changes greater than 10% of the impact indicators foreseen in the PCR;
- changes to the product, production process or any significant element, which may result in a change to the LCA model and its impacts;

a change to the additional Environmental Parameters.

If the changes to the environmental impact indicators are greater than 10% and are worse than the original values, the Organisation must modify the EPD because it is no longer representative of the environmental impacts of that product.

If the changes are greater than 10% of the environmental impact indicators and are better than the original values, the Organisation may decide not to modify the EPD since it contains precautionary data (in favour of environmental safety).

In any case, whenever the Organisation plans to modify and republish a previously validated EPD, ICMQ must verify it in order to validate it once more, and to this end will carry out the activities indicated in paragraph 12.

Specifically, where the changes concern additional environmental parameters, such as recycled content, ICMQ will carry out a remunerated analysis of the environmental parameters and the following criterion will apply:

- if the changes are greater than 10% and are better than the original values, the Organisation may decide, also for CAM purposes, not to modify the EPD since it contains precautionary data (in favour of environmental safety).
- if the changes are greater than 10% and are worse than the original values, the Certification Body will carry out a new verification for the validation, subject to a new offer.
- for the purposes of compliance with CAMs, if the changes are worse, albeit to a lesser extent than 10%, the Certification Body will carry out a new verification for the validation, subject to a new offer.

Following any changes, the Organisation will update the EPD and send it to ICMQ for verification. The updated EPD will have a field called "date updated" or similar on the cover. The related validation certificate will be re-issued by ICMQ with the current date corresponding to the date the EPD was updated, keeping the first issue and expiry date unchanged, unless the reference PCR version is modified.

The verifications carried out by ICMQ will be based on one of the following alternatives:

1. Same version of the Regulation and same revision of the PCR used during the assessment stage, even if they do not correspond to the revisions currently in effect: the revised EPD must maintain the original period of validity;
2. Version of the Regulation and the PCR as published in the Program Operator: the EPD will have a new period of validity and the document's issue date will be that of the new verification report, as established in paragraph 5.

If the modified EPD is based on a new version of the reference PCR, a new validation process will have to be carried out, completely the same as that envisaged for the first EPD generated through the use of the Tool, including the extension of the qualification of the Tool to the new PCR version. In this case the Certification Body will provide a specific offer.

If the tool is revised (see paragraph 7.1.1.4) and re-qualified, EPDs generated by the previous version of the tool will maintain their original expiry date.

12.6.1. Validating EPDs not generated by a TOOL

After validation, if the EPD is not modified, it will remain valid until its natural expiry date (five years), without further verification by ICMQ.

If, on the other hand, the EPD is modified, it will be necessary to validate the EPD again as indicated in paragraph 12.

At the end of the EPD's period of validity, it must be subject to a renewal verification by ICMQ.

12.6.2. Validating EPDs generated by an LCA-TOOL

After validation, if the EPD is not modified, it will remain valid until its natural expiry date (five years), without further verification by ICMQ.

If, on the other hand, the EPD is modified, it will be necessary to validate the EPD again in the manner provided for validating EPDs after the first one generated by a qualified LCA-TOOL (paragraph 7.1.1.1.4.2)

If the EPD is modified, the Organisation using the LCA-TOOL to develop the updated EPD (as the EPD Owner), must send, on an annual basis, a communication to ICMQ regarding the permanence of the requirements regarding the correct application of the processes in the use of the LCA-TOOL. In the case of changes, ICMQ will carry out verifications in relation to these requirements, as indicated in paragraph 7.1.1.1.2.

At the end of the EPD's period of validity, it must be subject to a renewal verification by ICMQ, in compliance with the methods foreseen for validating EPDs after the first one generated by a qualified LCA-TOOL (paragraph 7.1.1.1.4.2)

12.6.3. Validating EPDs generated by an EPD-TOOL

EPDs generated by an EPD-TOOL are valid for five years.

They are not subject to annual monitoring since changes in the LCA model, the production process or the component database result in a change in the version of the qualified EPD-TOOL which leads to the need for it to be qualified.

This new version of the TOOL will generate new EPDs relating to the same product, referring to the updated version of the tool.

ICMQ will keep track on its website of the correct association between the EPDs of the products issued and the version of the EPD-TOOL used.

The Organisation that uses the EPD-TOOL to develop the EPD (as the EPD Owner), must, on an annual basis, send ICMQ a communication regarding the continued training requirements on the correct use of the EPD-TOOL.

In the event of a change in these aspects, ICMQ will perform these verifications again so that the new EPDs produced by the Organisation can be validated.

At the end of the EPD's period of validity, it must be modified and re-issued by the Organisation using the version of the EPD-TOOL qualified by ICMQ.

On an annual basis, ICMQ will perform simplified sample checks of EPDs generated by the EPD-TOOL (primary data coherence included).

The sampled EPDs will be verified, in terms of the EPD's correct layout in accordance with the EPDItaly format and the consistency of the document with the one verified during the qualification of the tool.

12.7. Periodic checks to maintain the EPD Process Certificate

The EPD Process Certificate has a duration of three 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 paragraph 7.4.2).

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 paragraph 12.9.

12.8. Periodic checks to main the TOOL qualification certificate

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 paragraph 7.1.1.3.

The qualification on 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 paragraph 7.1.1.3.

If the Organisation holding the 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 paragraph 7.1.1.3.

12.9. Renewing the EPD Validation/EPD Process Certificate/TOOL Qualification Certificate

At the end of the Validation Certificate's/EPD Process Certificate's/TOOL Qualification Certificate's period of validity, and in line with the expiration of any reference PCR for the validation, ICMQ will carry out a renewal verification, performed with the same methods of verification provided for, in the various cases, when issuing a new EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate, as indicated in paragraph 7.1.

12.10. Verification for changes and extensions,

supplementary and/or extraordinary verifications

12.10.1. Verifications for validation extensions

The Client, who wishes to extend the validation of an EPD to other plants or other products, must submit a specific Validation Request to ICMQ in accordance with the procedure specified in paragraph 9. The ICMQ logo cannot be used until the validation extension has been obtained.

Verifications for extension may involve the following cases:

- Extension of an EPD (not generated with a tool) to a new product, production unit, LCA module. In this case, the organisation must request a specific offer from ICMQ, whose verification activity will follow the provisions of paragraph 12.1 and from paragraph 12.3 to paragraph 12.5;
- Extension of an EPD (generated with the use of an already qualified LCA/EPD-TOOL) to a new product and/or production unit. In this case, the organisation must request a specific offer from ICMQ, whose verification activity will follow the provisions from paragraph 12.1 to paragraph 12.5;
- Extension of a qualified tool to a new element of the field of application (e.g. product, production unit, LCA module). In this case, the organisation must request a specific offer from ICMQ, whose verification activity will require the qualification of the new version of the Tool in accordance with the provisions of paragraph 7.1.1.3, in relation to the type of extension requested.

12.10.2. Supplementary and/or extraordinary verifications

In the case of relevant non-conformities, ICMQ can require supplementary verifications or verifications that take place more than once a year. These verifications will be charged to the Client in accordance with the Rates Table in effect at the time of the verifications.

Furthermore, if ICMQ receives reports about complaints or Non-Conformities or if there are any reasons to question the effectiveness of the system used by the Client to collect and update data in the LCA study, ICMQ will have the right to perform an extraordinary audit to check whether the initial validation compliance of the EPD environmental declaration with the Standard of reference is still valid. 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 can take place without prior notice. Should the Client not allow ICMQ to carry out such a visit, the validity of the ICMQ validation certificate will be suspended immediately. The costs for these visits are always charged to the Client, except where the extraordinary audits do not reveal any Non-Conformities.

12.11. 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 validation;
- the EPD type (product, average, sector) and the number of EPDs to be validated;
- the number of sites covered by the EPD;
- the TOOL type (LCA-TOOL or EPD-TOOL);
- the number of additional environmental parameters.

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

13. Validity of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate

Without prejudice to paragraph 10, the validity of the EPD Validation Certificate or the EPD Process Certificate or the TOOL Qualification Certificate is subject to passing periodic maintenance checks.

14. Use of the EPD Validation Certificate/EPD Process

Certificate/Tool Qualification Certificate and ICMQ trademarks

The Client is granted a licence to use the ICMQ trademark, with the right to use it in technical and advertising documentation but within the limits set out in the specific DOC 05 Regulation for using a trademark.

In the event of an improper use of the EPD Validation Certificate/EPD Process Certificate/Tool Qualification Certificate or the aforementioned trademark, ICMQ will ask the Client to stop this practice immediately and will have the right to suspend or revoke the validation on the basis of the seriousness of the behaviour.

The Client holding the validation certificate must immediately cease use of the same and the aforementioned trademark in cases of suspension, revocation and waiver of validation as well as in the case of the contract being terminated.

If the Client does not use the validation certificate and/or the aforementioned trademark correctly, the Client will be obliged to pay a penalty in favour of ICMQ of 500.00 euro (five hundred) for each individual breach and 100.00 euro (one hundred) for every day of delay in complying with these obligations, without prejudice to further damages being sought. ICMQ reserves the right to take any legal action, as well as the right to publicise such action in magazines and newspapers, in addition to communicating it to the Competent Authorities.

15. Public Disclosure of the EPD Validation/EPD Process Certificate/TOOL Qualification Certificate

The Client authorises ICMQ to publish and/or to publicise the list of company clients holding an EPD Validation Certificate/EPD Process Certificate/Tool Qualification Certificate and their EPDs also in digitized format, so that anyone may verify their existence, as well as their validity status. ICMQ will also communicate this information to the Accreditation Body (Accredia), and any other authorized party who may request it, and where necessary mentioning it in the Newsletter and on the ICMQ website.

16. Suspending the EPD Validation/EPD Process Certificate/TOOL Qualification Certificate

ICMQ has the right to suspend the EPD Validation Certificate/EPD Process Certificate/Tool Qualification Certificate in all cases where, following a monitoring visit, a situation arises of a serious non-conformity regarding the Standard of reference, which shows that the validation no longer complies with the pre-established requirements.

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

- a) the Client's production activity is suspended by order of a Judicial Authority;
- b) the Client fails to adopt, within the set deadlines, corrective actions aimed at resolving the non-conformities detected including during the audits;
- c) the Client's corrective actions are ineffective, since they cannot ensure the correct management of the data and information contained in the EPD;
- d) the Client fails to adjust the validation, within the set deadline, following changes to the Standard;
- e) if the Client makes a change to a product and/or process and/or the TOOL and/or to any EPD environmental declaration without reporting these changes to ICMQ;
- f) the Client refuses to accept the audits established by these General Conditions and indicated as necessary by ICMQ;
- g) the Client refuses to accommodate, without a valid reason, the Auditors appointed by ICMQ, the auditors from Accreditation Bodies and/or Licensing Bodies and Observers;
- h) there are irregularities in the Client's use of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate and/or the trademarks held by ICMQ and accreditation bodies;
- i) the Client fails to comply with an obligation set out in these General Conditions, including any failure to pay an invoice

within the established deadline;

- j) if a deed of protest has been issued against the Client or if the Client is placed under liquidation or is subject to executive and/or insolvency procedures.

ICMQ will inform the Client of the suspension of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate by registered letter with return receipt or by certified email, specifying the duration of the suspension and the conditions under which the suspension may be revoked. During the period in which the certificate is suspended, the Client may not make use of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate, nor of the connected EPD. If the Client fails to comply with this obligation, the certificate will be revoked. Specifically, the Client must inform its (potential and current) customers and suppliers of the suspension where the certificate was (or may be) a decisive factor in the acquisition or maintenance of a contract/supply.

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

The Client may request the suspension of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate if the Client plans to suspend production of its products/services that fall within the validation scope for any reason, and for a significant period of time (more than three months), or where the Client relocates its production unit(s). In this case, ICMQ has the right to grant a suspension of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate for the period of time agreed with the Client which cannot, in any case, exceed 1 (one) year.

ICMQ will have the right to publicise the suspension of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate with any means.

If the reasons for the suspension of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate are no longer valid, ICMQ will notify the Client that the certificate has been re-activated.

The EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate will be suspended by ICMQ from the day on which the Client receives the notice of the suspension. During the suspension period, the Client is still required to pay the annual Maintenance fee set out in the Rates Table.

At the end of the suspension period, ICMQ has the right to carry out a supplementary audit, with the Client bearing the costs, to verify that the conditions to re-activate the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate are met. If the result of this verification is positive, the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate is re-activated. Otherwise, ICMQ may order the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate to be revoked. In either case, ICMQ will notify the Client in writing of the outcome of the verification.

17. Revoking and Waiving the EPD Validation/EPD Process Certificate/TOOL Qualification Certificate

17.1. Revocation

ICMQ will order the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate to be revoked in the most serious cases of a breach of these General Contract Conditions and/or the Standard of reference. Specifically, ICMQ will revoke the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate mentioned above in the following illustrative cases:

- a) serious non-conformities detected in the course of monitoring/renewal audits, confirmed by a formal opinion from the Certification Committee;
- b) persistence of the reasons which led to the suspension of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate, without the Client having taken the corrective actions within the pre-established deadline;
- 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

Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate for a period greater than 6 months or transfer of the production unit covered by the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate, without having promptly informed ICMQ;

- e) definitive interruption or transfer of the activities related to the products covered by the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate;
- f) if a deed of protest has been issued against the Client or if the Client is placed under liquidation or is subject to executive procedures;
- g) if the Client is subject to insolvency procedures and the receiver (or bankruptcy administrator) does not take over the bankrupt's position within the deadline required for the validation certificate to be maintained;
- 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 in the use of the EPD Validation Certificate/EPD Process Certificate/Tool Qualification Certificate and/or the trademarks held by ICMQ.
- j) the Client fails to fulfil the economic conditions (article 9.5 of these General Contract Conditions) for more than 30 (thirty) days, running from the formal notice to comply sent by ICMQ to the Client itself.

ICMQ will notify the Client of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate being revoked by registered letter with return receipt.

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

After receiving the revocation notice, the Client is required:

- a) to return the original EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate to ICMQ within 7 (seven) days from receiving such a notice, by registered letter, specifying the fulfilment of the obligations set out in letters b), c) and d) below;
- b) to refrain immediately from using copies and/or reproductions of the revoked EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate and the related EPD;
- c) to remove any reference to the revoked certificate from its letterhead (on letters, faxes and emails), business cards, technical and advertising material (including its company internet domain and any internet domains of associations of which it is a member) immediately;
- d) to inform its customers and suppliers immediately of this situation with the same method used to communicate the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate being issued.

The Client has the burden of demonstrating that it has fulfilled the aforesaid obligations in writing and, therefore, proof in texts is not admitted.

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

Following such a revocation, ICMQ will:

- a) cancel the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate;
- b) remove the Client from the "Registry of Certified Companies" holding an EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate and publicise this revocation with any means;
- c) refuse to consider a new request from the Client for an EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate until the Client has actually resolved the causes that led to this revocation.

ICMQ will have the right to publicise the revocation of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification

Certificate with any means.

The revocation of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate will not entitle the Client to claim a reimbursement of any price and/or fee paid for any reason, which will be withheld by way of a penalty, and/or will not annul its obligation to pay any amounts accrued in the meantime.

In any event, the Client is required to pay the maintenance fees for the entire calendar year in progress at the time the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate is revoked.

17.2. Waiving the EPD Validation/EPD Process Certificate/TOOL Qualification Certificate

The Client may waive the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate prior to its natural expiration by sending a registered letter with return receipt or a certified email, in the following cases:

- a) where it does not intend to maintain the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate, forwarding a formal cancellation notice to ICMQ at least six months in advance;
- b) in the event that the activities relating to the products or the production units for which the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate was granted are terminated;
- c) if amendments are made to the Standard and the Client cannot or does not intend to adapt its activities;
- d) where the Client 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 Conditions;
- e) if substantial corporate changes and/or changes to the Client's legal status have been made.

In the cases governed by letters c) and d), above, the Client must forward written notice of its waiver to ICMQ within thirty days from receiving notice of such changes.

In any case, the waiver will take effect:

- from the expiry of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate, if the next planned audit is renewal;
- from the first day of the month following the month scheduled to carry out the monitoring audit, if the next scheduled audit is monitoring and the Client does not plan on supporting this audit.

ICMQ will notify the Client, by registered letter with return receipt or by certified email, of the date on which the validity of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate expires.

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

From the date on which the validity of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate expires, the Client will be obliged:

- a) to return the original validation certificate to ICMQ within 7 (seven) days receiving such a notice, by registered letter, specifying the fulfilment of the obligations set out in letters b), c) and d) below;
- b) to refrain from using copies and/or reproductions of the waived EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate and the related EPD;
- c) to remove any reference to the waived EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate from its letterhead (on letters, faxes and emails), business cards, technical and advertising material (including its company internet domain and any internet domains of associations of which it is a member);
- d) to inform its customers and suppliers of this situation with the same method used to communicate the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate being issued.

The Client has the burden of demonstrating that it has fulfilled the aforesaid obligations in writing and, therefore, proof in texts is not

admitted.

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

On the date on which the validity of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate expires, ICMQ will:

- cancel the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate;
- remove the Client from the "Registry of Certified Companies" holding an EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate and publicise this waiver with any means;

The waiver of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate will not entitle the Client to claim a reimbursement of any price and/or fee paid for any reason, which will be withheld by way of a penalty, and/or will not annul its obligation to pay any amounts accrued in the meantime.

In any event, the Client is required to pay the maintenance fees for the entire calendar year in progress at the time the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate is waived.

In the event that the waiver of the validation is communicated with less notice than the term provided for in point a) and the Client arranges for an EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate from another certification body within 18 (eighteen) months from the waiver, the Client will be obliged to pay ICMQ a penalty equal to the fee due to the latter up to the natural three-year expiry of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate.

Should the Client waive the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate by reason of changes to the Rates Table referred to above, the fees in the Rates Table preceding such changes will be applied in the notice period.

18. Expiry of the EPD Validation/EPD Process Certificate/TOOL Qualification Certificate

The Client may allow the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate to expire without renewing it. In the event that the validation certificate is not renewed and consequently expires, ICMQ may notify the Program Operators and, in general, the competent bodies.

ICMQ will notify the Client, by registered letter with return receipt or by certified email, of the date on which the validity of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate expires.

From the date on which the validity of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate expires, the Client will be obliged:

- a) to return the original EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate to ICMQ within 7 (seven) days from receiving such a notice, by registered letter, specifying the fulfilment of the obligations set out in letters b), c) and d) below;
- b) to refrain from using copies and/or reproductions of the waived EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate and the related EPD;
- c) to remove any reference to the expired EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate from its letterhead (on letters, faxes and emails), business cards, technical and advertising material (including its company internet domain and any internet domains of associations of which it is a member);
- d) to inform its customers and suppliers of this situation with the same method used to communicate the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate being issued.

The Client has the burden of demonstrating that it has fulfilled the aforesaid obligations in writing and, therefore, proof in texts is not

admitted.

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

On the date on which the validity of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate expires, ICMQ will:

- cancel the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate;
- remove the Client from the "Registry of Certified Companies" holding an EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate and publicise this waiver with any means.

The expiry of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate will not entitle the Client to claim a reimbursement of any price and/or fee paid for any reason, which will be withheld by way of a penalty, and/or will not annul its obligation to pay any amounts accrued in the meantime.

In any event, the Client is required to pay the maintenance fees for the entire calendar year in progress at the time the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate expires.

19. Terminating the contract

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

- a) the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate is revoked;
- b) the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate is waived;
- c) the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate expires;
- d) there is a serious breach of these General 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.

20. Changes to the Standard and to these General Contract Conditions

Changes to the validation requirements may occur as a result of:

- changes to regulations and reference documents;
- changes to these general contract 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 Validation Certificate/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; and ICMQ will provide 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 not planning on adapting their EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate to changes in the standards of reference or in the conditions for issuing validation may waive their validation provided that they notify ICMQ in the manner indicated in article 17.2 of this document.

ICMQ, in the event of changes to the Standards of reference, reserves the right to verify the compliance of the EPD Validation Certificate/EPD Process Certificate/TOOL Qualification Certificate issued to the Organisation with the new requirements.

The costs of any audits shall be borne by the Organisation to which the validation was issued.

21. Civil 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 Client accepts that, in the event of non-fulfilment by ICMQ, it may seek compensation for any damage up to the maximum

amount equal to the total due to ICMQ for the entire duration of the validation 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.

22. Appeals

The Client may appeal an ICMQ decision as referred to in article 12.5, giving reasons for the appeal sent by registered letter with return receipt or by certified email, within thirty days of such a decision being communicated, or else this right will be lost.

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 Client.

23. Complaints and Grievances

Any complaints or grievances relating to the activities of either ICMQ or the Client can be addressed to ICMQ, as well as by the Client itself, including third parties who can refer to these General Contract Conditions available from the site www.icmq.org. A description of the complaints and grievances process is provided to those who request it.

24. 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.

25. Copyright

ICMQ is the holder of the copyright to all the documents (Application Guides and Checklists) provided to the Client. The latter may, therefore, use such documents solely within the scope of the validation contract with ICMQ. The Client cannot photocopy, reproduce or publish such documents, not even in part, without the prior written consent of ICMQ.

26. Disputes - Arbitration

26.1. 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 to the arbitrator's right to automatically extend the deadline, 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. Failing this, the defaulting party will pay the other party a 100.00 euro (one hundred) penalty for each day of delay.

26.2. Judicial Authority

ICMQ expressly reserves the right to bring an action before the Judicial Authorities of the Courts 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). Should the Client appeal such an injunction, it cannot raise any objections aimed at avoiding or delaying the performance required, except solely where such payments have already been made. Any other objection (except for objections that can be raised exclusively by the parties and any counter-claims) must be raised in the arbitration proceedings mentioned above.