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VVB approval procedure

The general requirements of EMG-GHG program

Legal entity of the VVB

- The VVB shall as a legal entity and it shall function legally, enter into contracts, make decisions in all activities independently.
- the VVB shall not has any pending judicial process for malpractice, fraud and/or other activity incompatible with functions as a validation/verification body.
- the VVB shall maintain a record of all the judicial processes pending against it as well as information of any judicial cases held in the past.

Personnel

General

- The VVB shall sets up, documents, implements and maintains procedures and records for the competency of validation/verification staff in order to assure that personnel are competent to carry out validation/verification activities.
- The VVB shall employ or has access to an adequate number of competent personnel to carry out validation/verification activities.
- The VB shall evaluate annually the sufficiency of resources required to carry out its validation/verification activities. It is also necessary to take into account the necessary competence related to the technical area(s), past performance of its validation /verification activities and expected volume of its validation/verification activities for the future. The VVB shall document the evaluation carried out and its results.
- The validation/verification personnel shall work under the responsibility of the top management of the VVB.
- The VVB shall fulfil the requirements of sufficient resources from the internal resource.
- The VVB can depend on external individuals in the validation/verification activities provided that:

- 1- They have the competency necessary to perform the validation/verification activities. And they have evidence of their competency, and the VVB shall retain their competency records.
- 2- They have an official contract with the VVB.
- 3- They know and understand the confidentiality and impartiality policies of the VVB and EMG-GHG program and they sign the impartiality declaration form and confidence and privacy form.

Competency of validation/verification team

- The validation/verification team shall, at a minimum, include a team Leader and a Validator/Verifier.
- The team have the necessary competency (according to ISO 14066) to carryout validation/verification activities such as knowledge and experience of the following standards and documents: ISO 17029, ISO 14064-1, ISO 4064-2, ISO 14064-3, the GHG protocol for waste management, ISO 19011, ISO 31000 and calculation of uncertainty in measurement results.
- Validation/verification team shall have the skills to communicate effectively with the VVB client.
- Validation/verification team shall technical and methodological aspects, including
 - 1- The technical processes and technologies, including the technical area(s) relevant to the activity
 - 2- Base year calculations and baseline scenario and monitoring methodology(ies) applied,
 - 3- calculation of GHG emission reductions or removals, environmental impact and monitoring requirements, measurement techniques, calibration and uncertainty in the measurement of the applicable parameters, and impact of failure of monitoring equipment on the measurement of emission reductions.

The validation/verification team shall have the knowledge in the following knowledge areas:

- Additionality assessment and baseline establishment
- GHG accounting and monitoring
- have the skills to assess the compliance of proposed facilities or project activities against all applicable requirements.
- Quality management systems (e.g. ISO 17025);
- Sustainable development impact assessment and monitoring.
- auditing knowledge and skills and the ability to apply them to perform validation or verification/certification activities including:

- 1- Data, information and system auditing techniques and methodologies.
- 2- Risk assessment techniques and methodologies
- 3- Data and information sampling techniques and methodologies.
- 4- Application of the concepts of materiality and level of assurance.
- 5- Collection of information through effective interviewing, listening, observing and reviewing documents, records and data.
- 6- Verification of the accuracy of collected information, evaluation of the sufficiency and appropriateness of gathered evidence to support validation or verification findings and conclusions, Preparation of validation or verification opinions and reports.


Team leader knowledge and skills

The team leader should meet the requirements of validator/verifier besides the following:

- validation or verification team leader shall have auditing knowledge and skills and the ability to apply them to perform validation or verification/certification activities, including:
 - 1- Knowledge and understanding of applicable Requirements, processes and procedures as required for the Project type under Validation or Verification.
 - 2- Planning and making effective use of human resources and managing validation or verification teams.
 - 3- Planning and organizing work effectively and performing it within the agreed time schedule, to priorities and focus on matters of significance.
 - 4- Representing the validation or verification team in communications with the EMG clients.
 - 5- Understanding the validation or verification/certification process, leading the team to reach conclusions on all aspects of the validation or verification/certification and complete the validation or verification/certification opinion and report.
 - 6- Preventing and resolving conflicts.

Competence for technical experts

- 1- A technical expert shall have specific knowledge and/or expertise in technical, methodological and sectoral aspects (such as waste management's GHG emissions) and demonstrable ability to apply such knowledge and skills.

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- 2- A technical expert shall be familiar with a EMG program procedure for audit functions and shall have access to an up-to-date set of documented procedures giving relevant instructions and information on EMG activities.

Competence for review team (independent reviewers)

- A review team, whether it is composed of one or more persons, shall collectively have all knowledge and skills required in team leader and the ability to apply such knowledge and skills, to conduct a technical review.

Evaluation of Competence and qualification of personnel

- The VVB shall establish, document, implement and maintain a procedure for evaluating its validation/verification personnel, for demonstrating that they have appropriate competence and meet applicable requirements as well as for qualifying and authorizing them before they perform validation/verification activities.
- The evaluation procedure includes:
 1. the consideration of the competence criteria, as determined above, and the competence requirements in ISO 14066.
 2. Address the qualification of personnel:
 - i. For all functions in validation/verification activities, i.e. validator, verifier, team leader, technical expert, and reviewer.
 - ii. In all technical areas in which the VVB intends to operate or within all sectoral scopes for which the EMG has applied for approval or has been approved.
- The VVB shall ensure that records of the evaluation- qualification-authorization process are retained
- The VVB can evaluate the competence of its personnel through the following methods, generating objective records for how competence was evaluated under each method:
 1. Review of personnel records, mentoring or training; and
 - The review of personnel records includes, but is not limited to, the review of curriculum vitae detailing work experience and education. Mentoring activities is

specific to the relevant function and/or technical area and covers the entire spectrum of responsibilities of the relevant function and/or technical area.

- Training programs are designed so as to cover the required knowledge and skills and shall comply with the requirements contained in paragraphs below.

2. An examination.

- The VVB staff (validator -verifier – reviewers- team leaders - individual experts) shall participate in all examinations provided by the EMG-GHG program. The validation/verification teams undergo exams at least once per year.

Trainings

- The VVB shall have a training plan and the staff (validator -verifier – reviewers – team leader, individual experts) shall participate in all mandatory training provided by the VVB or EMG concerning the program implementation.
- Where an evaluation (test) is required upon completion of any training program, the individual shall achieve at least a score of 70% or higher in each of the two evaluations (tests).
- Team Leaders, validator/verifiers and individual experts who score less than 70% take the training again and the subsequent test. If after two trials the threshold competency is not met (70% or higher) then an improvement plan shall be agreed with EMG, including a plan to re-take the examination. Failure to complete the agreed plan/examination shall result in removing the team leader or validator/verifier from validation/verification activities.
- Training and examination completion shall be monitored on an annual basis.

Monitoring of performance and ensuring competence

- The VVB and also EMG review of all (team leaders – validators – verifiers – technical expert – reviewers - individual expert) competency records each year. This annual review for validation/verification competence and performance is based on information gathered across the year, with training and assessment to remedy any performance problems.
- The VVB shall monitor in detail the first 4 to 6 engagements for newly validation/verification team members and individual experts, including review of work plans, verification teams, risk assessments, reports and findings.

- The VVB shall Provide immediate feedback on performance as audit engagements are planned, conducted and concluded.
- Serious problems with the performance can result in excluding the validation/verification team member from the team forever.

Personnel records

- The VVB shall maintain up-to-date personnel records of management and administrative personnel and the validation/verification personnel including those external to VVB. These records shall include relevant documentation related to recruitment, evaluations, qualifications, performance monitoring, training, experience, affiliations, professional status, and any consultancy services that the personnel have provided.
- The VVB shall document, implement and maintain a procedure for monitoring the performance of its validation/verification personnel to ensure appropriate performance and that their competence is maintained.
- The VVB ensure the maintenance and update of competence of its validation/verification personnel to keep up with newly introduced or revised the EMG program rules and requirements and shall take into account technological changes related to organization or project activities.

Quality management system

General

- The VVB shall establish, document, implement and maintain a quality management system for ensuring and demonstrating consistent implementation and compliance with the requirements outlined in ISO 17029: 2019.
- The VVB shall periodically update its quality management system, including all documents that form part of it, to reflect any changes in the rules and requirements of the international standards for validation/verification activities such as ISO 14064-3 and ISO 17029. Moreover, the management system addresses the outcomes of internal audits and management reviews.

validation/verification process and requirements

pre-engagement, engagement and contract review

- The VVB shall establish, document, implement and maintain a procedure for pre-engagement, engagement, preparing and reviewing contracts with clients for the provision of validation and verification/certification services.
- Before submitting a validation/verification proposal/quotation to a potential client and entering into a contract for the validation or verification/certification of organization or a project activity The VVB shall conduct a contract review and ensure that:
 - 1- It has sufficient human resources, internal or external, with the required competence to undertake the validation/verification activities.
 - 2- It has no impartiality issues with the conduct of the validation/verification activities.
 - 3- Considerations such as location(s) of the client's operations, time required to complete the validation/verification and any other issues influencing the validation/verification, such as safety conditions, etc., have been considered.
- The VVB shall has legally enforceable contracts with the organization owners (or representative person) or project developer (or representative person) to whom they provide validation/verifications services.
- The VVB shall has legally enforceable contract with the program owner to use EMG-GHG program.
- The VVB shall ensure that they provide an estimate of the time that will be taken to perform validation/verification functions in the contract signed with the organization owner or project developer.
- For each validation /verification conducted, the VVB shall document and maintain records of the complete details of the contract review process (conduct and approval of contract reviews), including the justification for the decision to undertake the validation/verification and the contract.

Selection of the validation/verification personnel

- The VVB shall document, implement and maintain a records and procedure for the selection of members of validation and verification/certification teams and members of technical review teams.
- For each validation/verification to be carried out, the VVB shall ensure, in addition to compliance with team competence requirements, that:

- 1- At least one member of the validation/verification team is qualified in the technical area(s) of facilities activities or the project activities to be validated/verified.
 - 2- At least one member of the independent review team is qualified in the technical area(s) of facility activity or project activity to be validated/verified.
- For each validation/verification to be carried out, the VVB shall ensure that:
 - 1- Each member of the validation/verification team and each member of the independent review team informs the VVB, prior to accepting the assignment, about any known existing, former or envisaged link to the facility activity or project activity to be validated/verified.
 - 2- All members of the validation/verification team and all members of the independent review team have no conflict of interest with respect to the facility activity or project activity to be validated/verified and satisfies all impartiality requirements.
 - The VVB shall have formal rules and/or contractual conditions to ensure that each member of the validation or verification/certification team and each member of the independent review team acts in an impartial and independent manner.
 - In selecting members of a validation/verification team, the VVB considers and documents the following aspects:
 - 1- Complexity of the facility activity or project activity.
 - 2- Risks associated with the facility activity or project activity.
 - 3- Technological and regulatory aspects
 - 4- Size and location of the facility
 - 5- Type and amount of field work necessary for the validation/verification process.
 - In advance of the validation/verification, the VVB shall provide the facility activity or project developer the names and tasks of the validation/verification team members and sufficient background information to allow the facility activity or project developer to object to the appointment of any particular member(s), with sufficient justification, and for VVB to reconstitute the team in response to any valid objection.

Validation/verification

- The VVB shall establish, document, implement and maintain a procedure for performing its validation/verification functions in accordance with the requirements specified in EMG-GHG program and other relevant requirements specified ISO 17029 and ISO 14064-3 standards.

- For the validation/verification visit to the facility activity or project activity site, the following personnel, at a minimum, shall participate in the visit:
 - ✓ The team leader (recommended but not mandatory).
 - ✓ The team member(s) qualified in the technical area(s) of the facility activity or project activity being validated/verified.

Independent review

- The VVB shall establish, document, implement and maintain a procedure for conducting independent reviews of final draft validation/verification opinions and reports prepared by validation/verification teams.
- Prior to the issuance of a final validation/verification opinion and report, the appointed independent review team shall conduct a technical review of the final draft validation/verification opinion and report.

Issuance of final validation/verification opinions, statements and reports

- The VVB shall establish, document, implement and maintain a procedure for approving and issuing final validation/verification statements, opinions and reports.
- A validation/verification statement, opinion and report are approved and issued only if the independent review has established that all applicable requirements of VVB and the program concerning validation/verification activities have been met.
- A final validation and verification statement, opinion and report are approved and issued by a member of the VVB management.

Control of records

- The VVB shall establish, document, implement and maintain a procedure for controlling the identification, collection, indexing, access, filing, storage, protection, retrieval, time retention and disposition of all its records.
- Records of original observations, derived data and sufficient information used to follow an audit trail shall be maintained to demonstrate compliance with the requirements.
- Records are retained for a period of time consistent with its contractual and legal obligations and VVB approval requirements. All records are held securely and safely so as to preserve all confidential information.

- The record control procedure should protect and back up records to prevent unauthorized access to, or amendment of, these records.

Records pertaining to validation/verification activities

- The VVB shall establish, document, implement and maintain a procedure for maintaining and managing specific records pertaining to its validation/verification activities.
- The VVB shall securely transports or transmits specific records pertaining to its validation/verification activities and securely maintains them in accordance with its own specified retention period.
- While performing audit, the VVB team shall assess whether the internal management system includes the following aspects:
 1. A clear definition of the roles and responsibilities of personnel involved in different tasks of program of activity.
 2. Records of arrangement for training and capacity development of the personnel.
 3. Records and documentation control process of program of activity.
 4. Measures for continuous improvements of the internal management system.

Complaints and appeals

- The VVB establish, document, implement and maintain a publicly available appeals procedure for receiving, managing, evaluating, and investigating complaints, making decisions on them, and making appropriate corrections and corrective actions. Through this procedure, clients can appeal assessment decisions as well as a complaints procedure through which stakeholders can raise complaints against project, project developer, auditor etc.
- The procedure referred shall include the following:
 - a. The designation of personnel responsible for handling of complaints.
 - b. The contact details of personnel responsible for the handling of complaints.
 - c. The process for receiving the complaint, gathering and verifying all necessary information for evaluating the validity of the complaint, investigating the complaint and for deciding what actions are to be taken in response to it.
 - d. Safeguarding the confidentiality of the complainant and subject of the complaint.
 - e. Ensuring that the personnel engaged in the complaint handling process are different from those who carried out the audit on the activity.

- Keeping the complainant informed of the progress and informing the complainant of the outcome of the investigation and the final notice of the end of the complaints handling process.
- The VVB shall investigate the allegations and specifies all proposed actions in response to the complainant within 3 months of receiving the complaint. In cases where the complainant is not satisfied with the decision, EMG informs the complainant that it has the option of making a complaint to the validation/verification appeal panel.
- It is necessary to be ensured by the VVB that appropriate corrections and corrective actions are taken following investigation of the complaint.

Internal audits

- The VVB shall establish, document, implement and maintain a procedure for conducting internal audits of its validation/verification functions in order to verify whether its quality management system is effective and ensure that its operations continue to comply with the ISO 17029 and EMG-GHG program requirements and its own documented policies and procedures.
- The VVB shall conducts an internal audit on its validation/ verification functions at least once a year and in accordance with a predetermined schedule and procedure.
- The VVB shall discusses the results of the internal audit in management review at least once a year and in accordance with a predetermined schedule and procedure.
- An internal audit shall:
 - a. Address all VVB approval requirements as stated in this document.
 - b. Be conducted by personnel independent of the function audited, either VVB own qualified personnel or an external qualified expert.
 - c. Ensure adequate recording of the function audited, the audit findings and non-conformities raised.
 - d. Include the verification and recording of the implementation and effectiveness of the corrections and corrective actions taken in response to the non-conformities raised in the internal audit.
- Corrective Actions
 - If the VVB identifies issues that require further elaboration, research or expansion to determine whether the project activity meets VVB requirements and can achieve credible GHG emission reductions or net anthropogenic GHG removals, the VVB ensures that these issues are accurately identified, formulated, discussed and concluded in the validation report.

- The VVB shall raise a Corrective Action Request (CAR) if one of the following situations occurs:
 - a. The facility or project participants have made mistakes that will influence the ability of the proposed facility or project activity to achieve real, measurable, verifiable and additional GHG emission reductions or net anthropogenic GHG removals.
 - b. The applicable ISO 17029/ISO 14064-3 /EMG-GHG program procedures requirements have not been met.
 - c. There is a risk that GHG emission reductions or net anthropogenic GHG removals cannot be monitored or calculated.
- The VVB resolve or “close out” CARs only if the facility owner or project developer modify the facility or project design, or provide additional explanations or evidence that satisfy the VVB concerns.

VVB eligibility & approval requirements

- This section describes the requirements for a VVB to become eligible and to maintain eligibility to conduct validation and verification assessments in support of EMG program.
- An approved VVB is known as an EMG-VVB and they are eligible for a number of different certification pathways (Annex A) and Sectoral scope (Annex D), dependent on their accreditation and competency backgrounds.

General Requirements

- All approved VVBs shall comply with the Requirements in this document and any other EMG rules, requirements and policies such as impartiality and confidentiality policies.
- All decisions regarding the approval, suspension, or cancellation of VVBs approval status, based on the results of oversight activities, are made at the sole discretion of the EMG, overseen by the technical advice committee.
- To conduct the validation and/or verification of a EMG Programme of activities and issue a validation and/or verification opinion and report, a VVB shall be approved by EMG program. The list of organization level and project level pathway is contained in Annex A and Sectoral Scope in Annex D of this document.

Legal status and matters


- A VVB shall be an entity registered under applicable national or international law so that it can function legally, enter into contracts, make decisions independently and may be sued in its own name.
- A VVB shall not have any pending judicial process for malpractice, fraud and/or other activity incompatible with functions as a VVB.
- A VVB shall maintain a record of all the judicial processes pending against it as well as information of any judicial cases held in the past.
- If the subject matter of a judicial process pending or instituted against the VVB is such that it is incompatible with its functions as a VVB, the VVB shall promptly report the matter to the EMG technical manager.
- To be eligible to become a EMG- VVB, a VVB must hold a valid accreditation or plan to be accredited within 6 months from NAB according to ISO 17029 (2019)

Scope and objective of approval assessments

- Approval is granted for both validation and/or verification functions
- Approval is granted to an entity registered under applicable national laws, irrespective of whether the entire organisation or a part of it performs validation and/or verification functions.
- Likewise, if approval is suspended or withdrawn, it is done so for both validation and verification functions together.
- The objective of an approval assessment of a VVB is to assess and determine whether the VVB complies with EMG-GHG program VVB requirements.
- If the validation and/or verification functions are performed by a part of VVB, and other parts of the VVB are involved in other activities, these activities may be assessed as they may affect validation and/or verification activities, in particular with regard to independence and impartiality.

Validity of EMG approval

- The approval of VVBs by EMG is provided on an ongoing basis.
- The approval may be reassessed and/or revoked at any time at the sole discretion of the EMG, overseen by the top management of EMG.
- EMG-VVB status is granted for a period of 48 months from the date of approval, whereupon the applicant may re-apply for approval.

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- Prior to expiration, the EMG-VVB shall re-submit the full set of information, as it will be described in the next paragraph below of this document, updated as required for re-approval. An application for re-approval shall be submitted no later than 3 months prior to the end of the 36-month period.

General method of approval assessments

- The assessment of a VVB for approval and for renewal of approval involves a desk-based review by the EMG technical manager.
- The application documentation submitted by the VVB to assess VVB eligibility, competence and operational capability to perform validation and/or verification functions in line with the EMG-VVB requirements will be reviewed.
- If, after the completion of an assessment, the VVB has demonstrated compliance with all requirements, approval or renewal of approval shall be granted to the VVB for the functions for which the VVB has demonstrated its competence.
- The language to be used in any approval assessment shall be English.

Approval procedure

General

The process for initial approval comprises the following steps:

- 1) Submission of an application for approval by an entity.
- 2) Completeness check of the application documentation by the technical manager of EMG.
- 3) Submission of documentation by the technical manager of EMG for technical committee of EMG for feedback
- 4) Desk review by the technical manager of EMG of the documentation provided by the VVB.
- 5) Final decision by the technical manager of EMG on approval or rejection of application.

Application for VVB approval


An entity that wishes to be approved as a VVB shall submit to the EMG technical manager a duly completed application form, a declaration from the entity and outsourced entities where the entity's validation and verification functions are to be performed, and all other documents specified below.

The VVB shall provide declaration that:

- 1) Confirms that the applicant has no financial interest in and no conflict of interest with EMG or any EMG Project (save for the provision of Validation/Verification services),
- 2) Declaration that the VVB has no pending judicial processes for malpractice, fraud and/or other activity incompatible with its functions as a VVB.

The applicant VVB shall provide following documents with completely filled application form:

- 1) Evidence confirming the legal status of the VVB entity.
- 2) Evidence to demonstrate that policies and mechanisms are in place to prevent conflicts of interest and to identify and resolve potential conflict of interest situations if they arise.
- 3) Organisational chart showing lines of authority, responsibility and allocation of functions. 4)
Demonstration that the team structure put forward has the necessary capacity and resilience to maintain its ability to audit EMG projects. For example, proof that the team is resilient to changes in staffing and has the necessary resource and backing to see through proposed workload.
- 5) Demonstration of team structure and key individuals' competence (via CVs and training records and previous experiences) relevant to the scope of the certification pathway(s) for which approval is sought.
- 6) A list of auditors that will apply for approval in a duly completed Staff Matrix, provided by EMG. At least one Team Leader and one Validator/Verifier shall be named in the application. Auditors can be included, removed, or replaced at a later date by submitting an updated Staff Matrix to EMG and subject to an individual auditor approval process as it will be clear below.
- 7) All named auditors must take the online exam set by EMG and receive a passing score of greater than 75% within four weeks of submission of application. If the auditor does not pass the exam, he/she may retake the exam. Only two retakes of the examination are allowed. If the applicant wishes to take second retake of examination, the applicant must take a paid online training.
- 8) A list of subcontracted individuals and document outlining the procedure for engaging external individuals. All subcontracted individuals must also take online exam and receive a passing score of greater than 75%.

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- EMG technical manager may request additional information or documentation from an applicant after receipt of the application for approval as a EMG-VVB.
- To apply for EMG-VVB status, a VVB shall send filled out application with evidence that the following requirements have been met to the EMG via email to abdo.fahmy@emg.org.
- The application of a VVB for approval shall be considered duly submitted when the EMG technical manager has received both the application documentation and the application fee.


Completeness check

- The EMG technical manager shall undertake a completeness check of the application documentation. If the documentation is found incomplete, the EMG technical manager shall inform the VVB of the missing elements within 9-15 days of the application being considered duly submitted. Subsequent steps of the process shall only continue once all requested documentation has been received by the EMG technical manager.

Desk review

- In parallel to technical advice committee review, the EMG technical manager shall undertake the desk review of the application documentation.
- If the EMG technical manager considers the information contained in the application documentation adequate for the assessment, it shall prepare and finalise the desk review within 4 weeks of the submission of the application and payment of the fee, whichever is later. The EMG technical manager shall consider the technical advice committee feedback, together with the desk review, to make the decision.
- The VVB shall provide the requested additional and/or amended documentation within 3 weeks of receipt of the review form. If the EMG technical manager considers that additional and/or amended documentation are adequate for the assessment, it shall prepare and finalise the desk review in 2 weeks. If the EMG technical manager considers that additional and/or amended documentation are not adequate for the assessment, it shall ask for further information.

Technical Advice Committee review

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- If the EMG technical manager considers the information contained in the application documentation adequate for the assessment, the EMG technical manager shall notify and make available VVB application and documentation to technical advice committee for their review.
- The technical advice committee review shall last for one month.

Approval decision

The EMG technical manager shall consider technical advice committee feedback, together with desk review findings, and decide on one of the following options:

- 1) Approve the VVB for some or all validation and/or verification pathways applied for; or
 - 2) Reject the application for approval.
- The EMG technical manager shall maintain a public list of approved VVBs on the EMG website, containing information on:
 - 1) Approved validation and/or verification pathways.
 - 2) Contact details and addresses VVB.
 - 3) List of approved auditors.
 - 4) Approval date and status; approved, suspended or cancelled.
 - Where an application is rejected, the EMG technical manager shall provide feedback indicating the rationale for rejection. Reapplication by the VVB may be submitted no sooner than 6 months after the date of communication of rejection by the EMG technical manager and shall include details of how the areas of feedback provided have been addressed, improved upon and resolved.

Addition/deletion of Auditors name

- The VVB shall contact EMG to seek modification to the list of approved auditors and submit an updated Staff Matrix to EMG.
- Any new named auditors shall take the examination and score at least 75% in order to be eligible for addition. If the auditor does not pass the exam, he/she may retake the exam once. If the applicant wishes to take second retake of examination, the applicant must take a paid online training.


Renewal of approval of VVB

- To submit the application of renewal of VVB, the VVB shall submit a new application.

- Within two weeks of receiving an application for re-approval and payment of applicable fee, the EMG technical manager shall conduct the completeness check and inform the VVB that either the application is complete, or that additional specific information is required to make the application complete.
- Upon confirmation by EMG that the application and all applicable training requirements are complete, the EMG performs a one-month review, overseen by the EMG Technical Advice Committee.
- EMG shall inform the VVB after one month review period, either that the re-approval is granted, or that additional specific information is required to make a decision.
- Where an application is rejected, the procedure outlined in paragraph (**Approval decision**) above is followed.
- EMG-VVB status is granted for a period of 48 months from the date of reapproval, whereupon the applicant may re-apply for approval.

Modification, suspension, or revocation of VVB – Status

- The EMG may review and, for good cause, including any violation or any similar action in an analogous GHG system, modify, suspend, or revoke approved EMG status granted to the VVB. The EMG shall not revoke the approval status without offering EMG -VVB an opportunity for presenting clarification.
- During suspension or revocation proceedings, the EMG -VVB may not continue to provide validation/verification services. The VVB and EMG shall agree on a course of action to close all outstanding audits and reviews that the VVB is involved in during the suspension or revocation. Terms and Conditions for EMG -VVBs apply.
- Within 21 days of suspension or revocation of EMG approval, a EM-VVB must notify all stakeholders; including project developers for whom it is provided validation/verification services or has provided validation/verification services within the past 6 months of its suspension or revocation of EMG approval, as well as the accreditation body/ies that provided the accreditation as per the Accreditation section above. The notification shall also include information on the course of action to conclude outstanding validations/verifications as agreed with EMG.
- An approved EMG-VVB may request to voluntarily withdraw its approval status by providing a written notice to the EMG requesting such withdrawal. The VVB and EMG shall agree on a course

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of action to close all outstanding audits and reviews that the VVB is involved in, before the VVB may disassociate completely from EMG. Terms and Conditions for EMG-VVBs apply.

Finance and liability

Financial stability


- A VVB shall demonstrate to the EMG throughout the approval term that it has the financial resources and stability required for its validation and/or verification functions through
 - 1) Evidence of financial resources including the previous three years' financial statements for companies existing for more than three years (e.g. balance sheets, profit and loss accounts); or any other relevant evidence such as shareholder commitment for newly established companies; and
 - 2) Business plan or workplan or equivalent financial plan for the next 4 years.
 - 3) A VVB shall establish, document, implement and maintain a procedure for regularly monitoring, at least annually, its income and expenditure to determine the financial stability and resources required for its validation and/or verification/certification functions.

Liability

- A VVB shall demonstrate to the EMG throughout the accreditation term that it has analysed, identified and evaluated the nature, scale and impact of all potential risks arising from its validation and/or verification functions, at least annually, and has arrangements as referred to in the paragraph below to cover the identified risks arising from its activities in validation and/or verification in the geographic areas it operates.
- The arrangements to cover potential risks shall be:
 - 1) Liability insurance; and/or
 - 2) Financial resource reserves, such as bank savings and/or short/long-term liquidities.

Information management

- Information to be made available in public domain
- A VVB shall maintain publicly available information required as below on its website throughout the approval term:

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- a. Information related to accredited sectoral scopes, locations of the central office and other offices or outsourced entities declared in application for approval or reapproval
- b. A list of all EMG projects which it has conducted the validation or verification
- c. The procedure on allocation of responsibilities within the organization established referred to in the paragraph above and information on names of management personnel and their corresponding responsibilities publicly available.
- d. The policy for safeguarding impartiality.
- e. The complaint handling procedure
- f. The appeals handling procedure

Confidentiality

- A VVB shall establish, document, implement and maintain a policy and mechanism to safeguard the confidentiality of information obtained or created during the course of validation and/or verification functions, except where provisions in EMG require them to be made publicly available.
- A VVB shall ensure that the personnel engaged shall also be bound by these confidentiality requirements, and the VVB shall have a mechanism to ensure compliance, such as by obtaining signed confidentiality agreements.
- A VVB shall not disclose any information about the project activity developer who are involved in the EMG for which the VVB provided validation or verification/certification services, that is not required by law or under EMG requirements to be made publicly available to a third party without the project activity developer's prior written consent. The VVB shall inform the activity developer before releasing confidential information to a third party, if required by law.