



GENERAL CONDITIONS: VERIFICATION NATIONAL CLIMATE LAW PROCESS

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This document describes the verification activities provided by COSMOCERT, concerning National Climate Law N4936/2022.

1. Verification description

1.1 Application and Review of application (pre-contract stage)

The first step is to gather the necessary information from the applicant. This includes the following:

- Annual GHG emissions Report / GHG Report (mandatory)
- Quantification Methodologies (including data selection and collection, selection or development of GHG quantification model) (mandatory)
- Calculation of GHG emissions and its result (mandatory, with the excel of the Ministry of Environment and Energy or relevant equally appropriate calculation methodology)
- A base-year review and recalculation procedures, if available
- GHG Baseline Scenario Selection Justification
- GHG Baseline methodology
- GHG reduction initiatives implemented at the organization, if implemented
- GHG Information management procedures (available on-site)
- Document retention and record keeping procedures (available on-site)
- GHG Data Flow, if available.
- Emission Monitoring Plan (it may be incorporated within the GHG Report)
- Previous Verification Report, if available.

In specific verification cases, additional supporting documentation may be requested upon at this stage. Such documentation may include operational, technical, financial, environmental, monitoring, maintenance, quality management, and activity data records necessary to support the verification of the reported GHG emissions and related disclosures. Such documentation may include, where applicable, permits and administrative approvals, fuel and energy consumption records, invoices, production and operational data, laboratory analyses and process measurements, maintenance and leakage records, refrigerant replenishment records, waste management data, wastewater treatment data, livestock activity data, emission factors, renewable energy certificates, carbon credit documentation, quality management and internal control procedures, training records, uncertainty calculations, and any other records necessary to substantiate the reported GHG emissions and related information.



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These data are the inputs for the Application Review. Through the application review COSMOCERT:

- (a) evaluate the risks involved to undertake the verification of the operator's report in accordance with this process;
- (b) undertake a review of the information supplied by the operator to determine the scope of the verification;
- (c) assess whether the engagement falls within the scope of its accreditation;
- (d) assess whether it has the competence, personnel and resources required to select a verification team capable of dealing with the complexity of the installation operator's activities and fleet as well as whether it is capable of successfully completing the verification activities within the timeframe required;
- (e) assess whether it is capable of ensuring that the potential verification team at its disposal holds all the competence, and persons required to carry out verification activities for that specific operator
- (f) determine, for each verification engagement requested, the time allocation needed to properly carry out the verification (time allocation).

After the application review stage, a financial proposal is prepared and send to the client. The time allocation indicated in the financial proposal.

Verification activities performed under the Greek National Climate Law may additionally be aligned with applicable voluntary or private GHG programmes in accordance with ISO 14064-1:2018, provided that the requirements of such programmes do not conflict with, replace, or reduce the mandatory legal, regulatory, verification, reporting, or platform obligations established under Law 4936/2022 and the applicable competent authority requirements.

1.2 After contract stage

1.2.1 Contract engagement

If the financial proposal be accepted by the client, the Contract (engagement) is prepared for signature by the applicant. If during the detailed verification the verifier finds that additional time is needed to properly carry out the necessary verification activities, the time allocation will be adjusted accordingly.



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1.2.2 Planning

COSMOCERT selects competent personnel and establishes plans to reduce the risk of material misstatement of the statement. The verification team shall be disclosed to the client prior to the verification itself. The client has the possibility to reject one or more verifiers within a certain period of time (5 days from receiving).

Clients must provide sufficient information for COSMOCERT to plan effectively, and a reasonable level of assurance requires more extensive verification activities.

1.2.3 Strategic Analysis / Risk Analysis

After signing the contract and assigning the responsible personnel, a strategic analysis is performed (pre-verification). In this stage, the results of the application review are taken into account (inputs).

The strategic analysis is always followed by a risk analysis (both stages are pre-verification) which is the evaluation of the "sources & magnitude" of potential "errors, omissions, and misstatements related to the verification activities. The risk analysis is evaluated throughout the verification process, particularly in response to evidence gathered and verification findings.

1.3 Verification Plan/ Business Process Analysis / Data Analysis/Site Visit

The lead verifier drafts a verification plan commensurate with the information obtained and the risks identified during the strategic analysis and the risk analysis, which is communicated to the responsible party and ensure that relevant responsible party's personnel are notified prior to the beginning of any site visit by signing and returning the relevant form to COSMOCERT. During this stage the test types are defined, and on-site visit is scheduled.

The verification activities performed on-site in order to gather sufficient evidence to conclude with reasonable assurance that the operator's emission report is free from material misstatements.

Activities during on site visit include at least:

1. interviewing staff, reviewing documents and assessing operator's procedures in practice;
2. checking the installation's boundaries, the data flow and assessing the completeness of source streams and emission sources;
3. actual testing of the control activities and assessing the application of procedures mentioned in the approved monitoring plan;



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4. obtaining physical evidence through assessment of measurement equipment, monitoring systems and processes.

Upon the arrival of the verification team to the premises, an opening meeting is held where the lead verifier introduces the verification team to the client, clarifies the responsibilities of each verifier and briefly explains the process in a timely manner. The lead verifier shall, clarify the terms of the verification in a clear and transparent manner.

The team, which may be one person, will carry out the activities identified in the plan, which specifies where and how they will be carried out.

At the end of the site visit, the closing meeting is held, where the lead verifier presents to the company the findings of the verification, including any non-conformities, misstatements and suggestions for improvement.

During the on-site verification, the List of participants is completed.

1.3.1 Verification report and verification statement / Non-conformities

Based on the findings, the verification team will determine whether there are any misstatements or nonconformities with the statement. These may need to be closed in order for a positive opinion to be issued, particularly if they are found to be material.

Any misstatements identified may require additional activities.

More specifically, when the verification is complete, the verification team arrives at a location provided by the company and after collecting the audit findings, prepares and completes the verification report and reports any misstatements, non-conformities, non-compliances. The verification statement is the summary of the entire verification report and states the verifier's overall opinion of the reported data.

The categorization of the verification findings is as follows:

Material non-conformity: is a failure to meet of the requirements that is caused by inadequate GHG information system and control, competence and infrastructure. Material non-conformity is a nonconformity caused by things that directly affect the GHG calculation, for example, there are emission sources that are not identified and included in the GHG calculation. A material non-conformity occurs when the GHG value as a result of the verification exceeds the agreed materiality threshold.



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Non Material non-conformity: is a non-conformity caused by factors that do not directly affect the GHG calculation.

The lead verifier shall reach a conclusion based on the evidence gathered and draft a verification opinion based on the evidence gathered during the verification and choose one of the options unmodified opinion, modified opinion or adverse opinion.

In order to draft a modified opinion, the lead verifier shall ensure that there is no material misstatement at the level of the GHG statement.

In order to draft an adverse opinion, the lead verifier shall conclude that:

- a) there is insufficient or inappropriate evidence to support an unmodified or modified opinion; or
- b) criteria are not appropriately applied for material emissions, removals or storage; or
- c) the effectiveness of controls cannot be determined when the verifier intends to rely on those controls.

If the client does not correct any material misstatement or nonconformity in an agreed period of time, the verifier shall take this into consideration when reaching the conclusion.

In order to disclaim the issuance of an opinion, the lead verifier shall ensure that he/she has been unable to obtain sufficient appropriate evidence and concludes that the possible effects on the GHG statement of undetected material misstatement(s) are material and pervasive.

When completing the verification and considering the information obtained during the verification, the verifier:

- (a) check the final data from the operator, including data that have been adjusted based upon information obtained during the verification;
- (b) review the operator's reasons for any differences between the final data and data previously provided;
- (c) review the outcome of the assessment to determine whether the monitoring plan approved by the competent authority or monitoring methodology plan, as appropriate, including the procedures described in that plan, has been implemented correctly;
- (d) assess whether the verification risk is at an acceptably low level to obtain reasonable assurance;



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(e) ensure that sufficient evidence has been gathered to be able to give a verification opinion with reasonable assurance that the report is free from material misstatements;

(f) ensure that the verification process is fully documented in the internal verification documentation and that a final judgment in the verification report can be given.

After the verification process is completed (documentation review and on-site verification), a verification report is prepared summarizing the results of the verification. The lead verifier is responsible for drafting the verification report and therefore for the assessment of the findings based on the results of the assessment.

The statement/opinion shall be prepared by the lead verifier after the verification process is completed, where there is a possibility of material misstatement and/or nonconformity, issued to the client. The material misstatement and/or nonconformity must be resolved within 30 days.

The final report and statement/opinion is issued after the non nonconformity have been corrected by the client and its conformity has been verified by the lead verifier.

This final report includes the lead verifier's conclusion and final statement/opinion.

1. 4 Independent Review

Before COSMOCERT issues a final verification statement, it is independently reviewed to ensure that the risk of issuing the statement is acceptably low.

Independent reviewers shall be selected who are competent and different from the persons who performed the verification and who were not involved in the planning of the verification. The independent review shall be completed before the statement is issued. The independent review may be performed during the verification process to allow significant issues identified by the independent reviewer to be resolved before the final statement is issued.

1.4.1 Issuance and use of Final Verification Statement

After the completion of the independent review, the Verification-Validation Manager issue a final verification statement to the operator emission report , that was subject to verification.



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The Final Verification Statement shall state that the relevant report of the operator is in compliance with the approved monitoring methodology and the requirements of the license emissions and that there are no material inaccuracies in the reported total emissions.

The signed copies of the verification report and final verification statement shall be sent in electronic form to the installation's or the operator's emissions management officer for forwarding to the competent authority no later than 31 March of the year following the reporting year.

1.4.2 Facts discovered after the verification

If new facts or information that could materially affect the verification statement are discovered after the issue date, the VVB shall:

- a) communicate the matter as soon as practicable to the client and, if required, the programme owner;
- b) take appropriate action, including the following:
 - 1) discuss the matter with the client;
 - 2) consider if the verification statement requires revision or withdrawal.

If the verification statement requires revision, the VVB shall implement processes to issue a new statement including specification of the reasons for the revision.

These can include repeating relevant steps of the verification process.

The VVB may also communicate to other interested parties the fact that reliance of the original statement can now be compromised given the new facts or information.

Information about the client obtained from sources other than the client (e.g. complainant, regulatory authority) **is confidential** between the client and the verification body. The provider (source) of this information is confidential to the Verification-Validation Body and will not be disclosed to the client unless the source agrees.

1.4.3 Import / Approval of Data in the National DataBases

For Operations that report under Article 19 of the Greek National Climate Law (Law 4936/2022), the client is solely responsible for the submission of emissions data to the Electronic Environmental Registry (HER). COSMOCERT is not involved in the data submission process for Article 19 obligations.



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For Operations reporting under Article 20 of Law 4936/2022, verified carbon footprint reports are submitted through the Climate Change and Sustainability Platform of NECCA (O.FY.PE.K.A.). In such cases, the VVB assigned to conduct the verification process is granted dedicated platform access as an accredited Verification Body, in accordance with the applicable regulatory and platform requirements, and is responsible for completing all actions required for the submission of the verified report.

2. Complaints And Appeals

Written complaints may be submitted to the Verification-Validation Body (VVB) by the client (e.g. regarding personnel conduct) or by clients of verified clients, other interested parties, etc.

The resolution of complaints shall be made by, or reviewed and approved by, persons not involved in the complaint in question. Where resources do not permit this, any alternative approach shall not compromise impartiality.

A client using the VVB's verification services has the right to appeal in writing against decisions taken by the VVB (e.g. not to issue a verification statement).

The decision on the appeal shall be made by, or reviewed and approved by, persons who were not involved in the decision that is the subject of the appeal.

In the case of a complaint or appeal, the VB will acknowledge receipt in writing. It will then undertake, in accordance with its internal procedures, to use independent and qualified personnel to reach a decision and provide a response within 30 days of receipt of the complaint or appeal.

3. Impartiality

Decisions are based on objective evidence obtained through the verification process and are not influenced by other interests or parties.

Threats to impartiality can include but are not limited to the following.

- a) Self-interest: threats that arise from a person or body acting in their own interest. A concern related to verification, as a threat to impartiality, is financial self-interest.
- b) Self-review: threats that arise from a person or body reviewing the work done by themselves.
- c) Familiarity (or trust): threats that arise from a person or body being too familiar with or trusting of another person instead of seeking evidence for verification.



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- d) Intimidation: threats that arise from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

The Verification-Validation Body ensures, through a mechanism independent of its operations, that impartiality is being achieved.

4. Confidentiality

The verification-validation body is responsible, through legally enforceable agreements, for the management of all information obtained or created during the performance of verification activities.

The verification-validation body shall inform the client, in advance, of the information it intends to place in the public domain.

Except for information that the client makes publicly available, or when agreed between the verification body and the client, all other information is considered proprietary information and are **regarded as confidential**.

When the verification-validation body is required by law or authorized by contractual arrangements to release confidential information, the client or individual concerned shall, unless prohibited by law, be notified of the information released.

Information about the client obtained from sources other than the client (e.g. complainant, regulatory authority) shall be confidential between the client and the verification-validation body. The provider (source) of this information shall be confidential to the body and shall not be shared with the client, unless agreed by the source.

This confidentially undertaking shall continue for 3 years after termination of the Agreement with client.

5. Information requirements. Policy for communication with the operator and other relevant parties

COSMOCERT shall provide upon request clear, traceable and accurate information about its activities and the sectors in which it operates.

COSMOCERT shall provide upon request the status of a given verification statement.

COSMOCERT body shall provide information and update clients on the following:



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- a) the applicable verification programmes and any changes;
- b) the fees for the verification activity;
- c) the verification body's requirements for the client to:
 - 1) comply with the verification programme;
 - 2) make all necessary arrangements for the conduct of the verification activities;
 - 3) make provisions, where applicable, to accommodate the presence of observers (e.g. accreditation assessors or trainee verifier);
- d) its policy governing any statement that the client is authorized to use when making reference to its verification statement in communication of any kind in line with the requirements in 7, below.



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6. Use of Verification Statement

The use of the verification statement issued by COSMOCERT is strictly limited to the verified greenhouse gas emissions data or other environmental information as defined under the scope of National Climate Law N4936/2022 as amended and in force. The statement may only be used by the company to demonstrate compliance with the applicable legal requirements and shall not be used for promotional or marketing purposes in a manner that may mislead stakeholders. Any reference to the verification shall include the full verification statement. The company shall not use the verification statement or any associated mark or symbol on products, packaging, or in ways that imply product certification or endorsement by COSMOCERT. Any misuse or unauthorized use of the verification statement or the COSMOCERT mark shall result in corrective action and may lead to suspension or withdrawal of the verification.

7. Principles of Operation

COSMOCERT will undertake National Climate Law verification according to:

- ISO 14065 – General principles and requirements for bodies validating and verifying environmental information.
- ISO/IEC 17029 Conformity assessment- General principles and requirements for validation and verification bodies.
- ISO 14066 - Environmental information- Competence requirements for teams validating and verifying environmental information.
- Law 4936/2022 and any ministerial decision or applicable guidance and circulars

Principles of verification are as follows:

- Impartiality
- Competence
- Confidentiality
- Openness
- Responsibility
- Risk-based approach

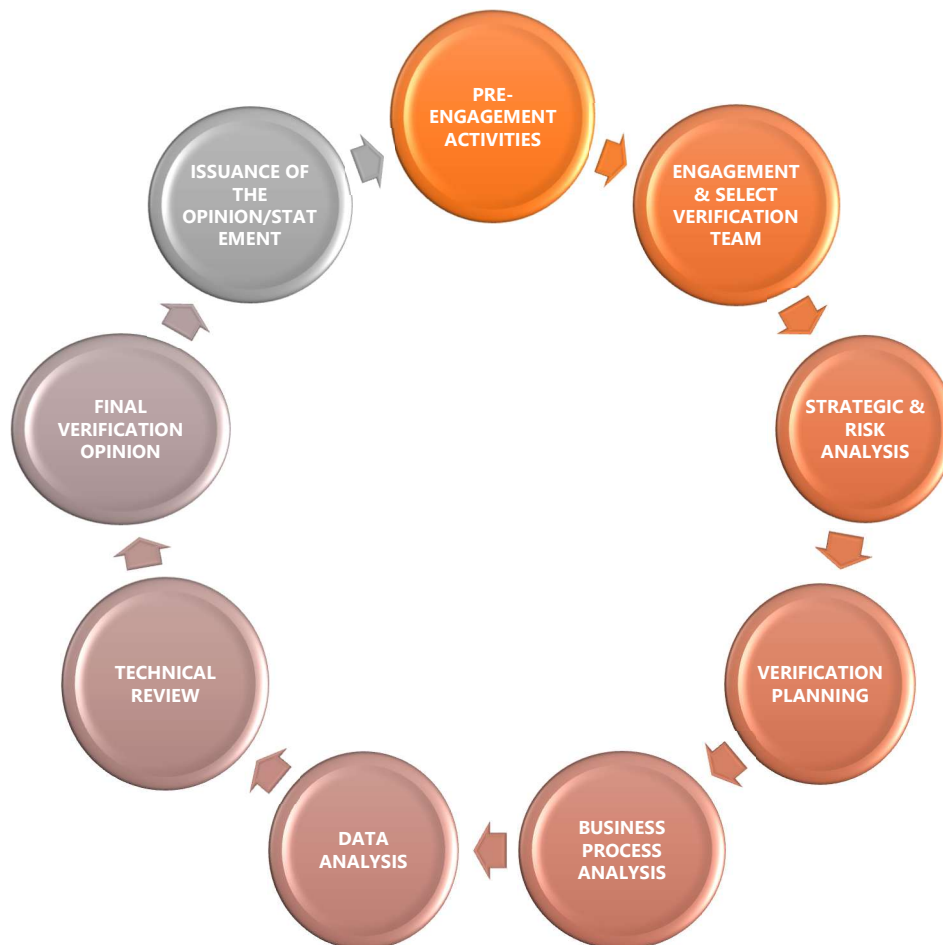
The overall process is described below:

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Step	Task Description	Verification- Validation Body (VVB)	Client
Pre-Engagement			
1.	Submission of completed Application		x
2.	Application review and financial offer	x	
3.	Signed financial offer returned by the client and sending agreement for signing (by the VVB)	x	x
Verification Process			
4.	Strategic and Risk Analysis	x	
5.	Verification plan for on-site visit	x	
6.	If necessary, clarifications and corrections		x
7.	Verification report	x	
8.	Independent Review	x	
9.	Issue of Verification Statement	x	

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8. ANNEX I: VERIFICATION PROCESS



9. LIST OF AMENDMENTS

Version No	Effective date	Written by	Description of Amendment
1.	01/04/2026	QAM	INITIAL VERSION IN ACCORDANCE WITH ISO 17029, ISO 14065, ISO 14064-3, National Climate Law N4936/2022