

# GENERAL RULES FOR VALIDATION / VERIFICATION



| Verum et Accuratus  | QUALITY                                   | SYSTEM PROCED  | URES  |         |
|---------------------|---|----------------|-------|---------|
|                     | General Rules for Validation/Verification |                |       |         |
|                     | Effective date: 01/08/2024                |                |       |         |
| True & Accurate     |   |                |       |         |
| Authorised by:      | Revision No.:                             | Revision Date: | Page: |         |
| Panagiotis Tsatsios | 01  | 01/08/2024     | -     | 2 of 13 |

| Verum et Accuratus  | QUALIT                                    | Y SYSTEM PROCED | URES  |    |
|---------------------|---|-----------------|-------|----|
|                     | General Rules for Validation/Verification |                 |       |    |
|                     | Effective date: 01/08/2024                |                 |       |    |
|                     |   |                 |       |    |
| True & Accurate     |   |                 |       |    |
| Authorised by:      | Revision No.:                             | Revision Date:  | Page: |    |
| Panagiotis Tsatsios | 01  | 01/08/2024      | 3 of  | 13 |

# Contents

| CHAPTER 1 – GENERAL  | 3      |
|--|--------|
| CHAPTER 2 – REFERENCE SCHEME/PROGRAM / REQUIREMENTS FOR VALIDATION/VERIFIC | ATION4 |
| CHAPTER 3 - CONTRACT   | 4      |
| CHAPTER 4 – PLANNING   | 5      |
| CHAPTER 5 – VALIDATION/VERIFICATION EXECUTION                              | 6      |
| CHAPTER 6 – DECISION AND ISSUE OF THE VALIDATION/VERIFICATION STATEMENT    | 7      |
| CHAPTER 7 – MODIFICATION AND WITHDRAWAL OF THE STATEMENT                   | 8      |
| CHAPTER 8 - COMPLAINTS AND APPEALS MANAGEMENT                              | 8      |
| CHAPTER 9 - CONTRACTUAL CONDITIONS   | 9      |

| Verum et Accuratus  | QUALITY                                   | <b>SYSTEM PROCED</b> | URES  |         |
|---------------------|---|----------------------|-------|---------|
|                     | General Rules for Validation/Verification |                      |       |         |
| $(\otimes)$         | Effective date: 01/08/2024                |                      |       |         |
| True & Accurate     |   |                      |       |         |
| Authorised by:      | Revision No.:                             | Revision Date:       | Page: |         |
| Panagiotis Tsatsios | 01  | 01/08/2024           |       | 4 of 13 |

# CHAPTER 1 – GENERAL

# 1.1 Procedures for Validation and Verification

The Rules of Validation and Verification delineate the procedures administered by Verum et Accuratus for validation and verification activities, elucidating how organizations can request, obtain, retain, and utilize these services. Validation and verification serve as a confirmation of the reliability of information declared in claims. Other terms in use for the object of assessment by validation and verification are "statement", "declaration", "assertion", "prediction" or "report". For uniformity and simplicity we will always use the term "claim" in the remainder of this document to indicate the information declared subject to validation. Both activities are distinguished based on the timeline of the assessed claim, with validation addressing claims related to intended future use or projected outcomes, while verification focuses on claims concerning past events or obtained results.

The list of schemes/programmes for which VERUM ET ACCURATUS is accredited is available on the website vaverifiers.com.

## **1.2 Access to Validation and Verification Services**

Access to validation and verification services is unrestricted and available to all applicants, regardless of their association membership status. Verum et Accuratus applies transparent tariffs for these services, ensuring fairness and uniformity in their application.

The organization reserves the right to decline requests from applicants subjected to restrictive measures by public authorities, with reasons communicated to the applicant in such cases.

## **1.3 Compliance with ISO Standards**

Validation and verification activities, as described in these Rules of Validation and Verification, adhere strictly to the requirements outlined in ISO 17029:2019, ISO 14065:2022, and ISO 14064-3:2019 Standards.

## 1.4 Safety Measures and Coordination Obligations

Applicants undertake to ensure Verum et Accuratus personnel's compliance with workplace safety regulations. They are also responsible for fulfilling information and coordination obligations toward Verum et Accuratus personnel, as per local health and safety requirements. Additionally, the participation of observers during evaluation activities is contingent upon mutual agreement between Verum et Accuratus and the applicant.

## **1.5 Guiding Principles and Responsibilities**

Verum et Accuratus upholds fundamental guiding principles throughout the validation and verification processes, ensuring accuracy, prudence, relevance, credibility, reliability, completeness, consistency, transparency, impartiality, competence, independence, and safeguarding against conflicts of interest and confidentiality.

The responsibility for claim compliance lies with the client, while Verum et Accuratus is responsible for substantiating validation/verification statements with sufficient and appropriate objective evidence.

## 1.6 Terminology Consistency

The terminology used throughout these Rules of Validation and Verification aligns meticulously with the standards outlined in ISO 17029:2019, ISO 14065:2022, and ISO 14064-3:2019.

| Verum et Accuratus  | QUALITY                                   | <b>Y SYSTEM PROCED</b> | OURES |         |
|---------------------|---|------------------------|-------|---------|
|                     | General Rules for Validation/Verification |                        |       |         |
|                     | Effective date: 01/08/2024                |                        |       |         |
|                     |   |                        |       |         |
| True & Accurate     |   |                        |       |         |
| Authorised by:      | Revision No.:                             | Revision Date:         | Page: |         |
| Panagiotis Tsatsios | 01  | 01/08/2024             |       | 5 of 13 |

# <u>CHAPTER 2 – REFERENCE SCHEME/PROGRAM / REQUIREMENTS FOR</u> VALIDATION/VERIFICATION

# 2.1 Claim Eligibility Criteria

To undergo validation/verification by Verum et Accuratus, a claim must align with the requirements of the scheme/program and those delineated in this Chapter, along with any additional elements mandated by Accreditation Bodies.

In the realm of accreditation, Verum et Accuratus is obligated to adhere to specific reference documents issued by Accreditation Bodies. These documents are accessible either through Verum et Accuratus or directly from the Accreditation Bodies (e.g., by consulting their respective websites).

## 2.2 Validation/Verification Process Overview

The compliance of the claim with the reference scheme/program is validated through an activity program comprising:

- Pre-engagement;
- Engagement;
- Planning;
- Validation / Verification execution;
- Review;
- Decision and issue of the validation / verification statement.

# 2.3 Requirements for Claim Validation/Verification

In order to obtain validation/verification of the claim, the Organization must:

- Establish, implement, and sustain active procedures to fulfill all requirements specified in the schemes and/or programs associated with the claim.
- Maintain documented information:
  - o requested by the scheme and/or program of reference,
  - deemed necessary by the Organisation to ensure that the claim is plausible for future intentional use, in the event of a validation request, or truthfully declared in the event of a verification request.

Any information provided by the Organization remains confidential

| Verum et Accuratus  | QUALITY SYSTEM PROCEDURES                 |                |       |         |
|---------------------|---|----------------|-------|---------|
|                     | General Rules for Validation/Verification |                |       |         |
|                     | Effective date: 01/08/2024                |                |       |         |
|                     |   |                |       |         |
| True & Accurate     |   |                |       |         |
| Authorised by:      | Revision No.:                             | Revision Date: | Page: |         |
| Panagiotis Tsatsios | 01  | 01/08/2024     | -     | 6 of 13 |

# **CHAPTER 3 - CONTRACT**

# 3.1 Initiation of Validation/Verification Process

Organisations seeking validation/verification of their claim must provide Verum et Accuratus with the essential data of their Organisation and related activities and the location of the Site/s, on the basis of which an economic offer is made by Verum et Accuratus.

In particular, the Organisation must provide:

- customer name and proposed claim to be validated/verified;
- location where the client's activities are carried out;
- the validation/verification scheme/program and the associated specific requirements for validation/verification;
- the objectives and purpose of validation/verification;
- reports, data and any other relevant information;
- materiality and level of assurance;
- any other specific information that may be required by the validation/verification scheme/program. This information must be received by an authorised representative of the applicant Organisation.

Based on this information, Verum et Accuratus prepares an adequate economic offer.

# **3.2 Validation/Verification Request Formalization**

In case of acceptance of the economic offer, the Organisations formalise the validation/verification request by sending the specific form attached to the offer to Verum et Accuratus, indicating the scheme/program, according to which validation/verification is required.

Upon receipt of the validation/verification request and its annexes, and after their preliminary examination to verify its completeness, Verum et Accuratus sends the Organisation in writing confirmation of acceptance of the request.

The request of the Organisation, in which this Rule is expressly referred to, and the relative acceptance by Verum et Accuratus contractually formalise the relationship between Verum et Accuratus and the Organisation and the applicability of these Rules and of any specific additions applicable to the scheme/program for which validation/verification is required, included in the specific annex to these Rules.

The contract stipulated between Verum et Accuratus and the Organisation includes:

- an applicable programme exists or a programme is to be established;
- the claim is understood (e.g. context, content and complexity);
- the objectives and scope of the validation/verification have been agreed with the client;
- the specified requirements against which the claim will be validated/verified have been identified and are suitable;
- where applicable, the materiality and level of assurance have been agreed;
- the process for validation/verification activities can be achieved (e.g. evidence gathering activities, evaluation of gathered evidences);
- the validation/verification duration can be estimated;
- the validation/verification body has identified and has access to the resources and competences that are required to undertake the validation/verification;
- the time frame for the planned validation/verification can be proposed.

The present General Rules for Validation/Verification are duly notified to the client along with the Contract which is to be duly signed and returned, to declare acceptance and establish the contractual agreement between Verum et Accuratus and the client. Under the Contracts' Terms and Conditions, there is specific reference to the provision of these Rules to the client along with the Contract, confirmation for their review and understanding by the client and of course the client's acknowledgement and understanding that any independent verification/validation activities shall be executed in full accordance with these Rules.

| Verum et Accuratus  | QUALITY SYSTEM PROCEDURES                 |                |       |         |
|---------------------|---|----------------|-------|---------|
|                     | General Rules for Validation/Verification |                |       |         |
|                     | Effective date: 01/08/2024                |                |       |         |
|                     |   |                |       |         |
| True & Accurate     |   |                |       |         |
| Authorised by:      | Revision No.:                             | Revision Date: | Page: |         |
| Panagiotis Tsatsios | 01  | 01/08/2024     |       | 7 of 13 |

# **CHAPTER 4 – PLANNING**

## 4.1 Documentation Submission and Risk Assessment

Upon submission of the validation/verification request, or subsequently, the Organization must provide Verum et Accuratus with:

- the documented information required by the reference scheme/program and/or deemed necessary by the Organisation to ensure the absence of significant errors relating to the claim;
- copy of the Chamber of Commerce registration certificate or equivalent document, as evidence of the existence of the Organisation and the activity carried out.

Verum et Accuratus may request at its discretion, for examination, also other documents than those indicated above, deemed important for the validation/verification of the claim.

The above documentation is assessed by Verum et Accuratus for compliance with the reference scheme/program and the requirements of these Rules for Validation and Verification .

Verum et Accuratus takes into account the associated risks so that competence, consistency and impartiality are guaranteed during the validation/verification process.

The risks that Verum et Accuratus assesses include:

- a) the susceptibility of any parameter included in the claim that may generate a significant error, even if a control system has been implemented;
- b) the level of assurance to be achieved;
- c) the perception of interested parties;
- d) any misleading claims or misuse of marks by the customer;
- e) risk control and improvement opportunities.

## 4.2 Team Selection and Impartiality Assurance

Verum et Accuratus selects the team that performs the validation/verification activities and the staff who will carry out the activity of Review of the results, based on the knowledge, skills and competences necessary, taking into account the criteria/requirements of the agreed scheme/program and any additional elements indicated by the oversight body of the scheme/program, by the accreditation body/Competent Authority.

The team is completely independent from all aspects of the claim and has not participated in any way in the design of any part of it or of the related information system, in accordance with the procedures approved by the Committee for the Safeguarding of Impartiality.

## 4.3 Validation/Verification Plan Preparation

For each validation/verification activity, a Validation/Verification Plan is prepared in accordance with the provisions of the ISO 14065:2022, ISO 17029:2019 and ISO 14064-3:2019, which is sent to the Organisation in advance.

Verum et Accuratus, through the Validation/Verification Plan, communicates the names of the team members and any technical experts in charge of carrying out the validation/verification, observers, interpreters or translators chosen on the basis of the skills necessary for carrying out the activities.

The Organisation can object to these appointments, justifying the reasons.

Verum et Accuratus reconstitutes the team following valid objections.

In the Validation/Verification Plan, the assigned tasks are indicated for each team member. In particular, it is required that for each Organisation:

a) the structure, processes, registrations and related documents, relevant to the claim, are examined and verified;

b) it is established that they meet the requirements applicable to the scope of application envisaged by the validation/verification;

c) it is established that the defined documented processes and information are prepared,

implemented and effectively kept active, in order to form the basis for trust in the Organisation's claim.

| Verum et Accuratus  | QUALITY SYSTEM PROCEDURES                 |                |       |         |
|---------------------|---|----------------|-------|---------|
|                     | General Rules for Validation/Verification |                |       |         |
|                     | Effective date: 01/08/2024                |                |       |         |
|                     |   |                |       |         |
| True & Accurate     |   |                |       |         |
| Authorised by:      | Revision No.:                             | Revision Date: | Page: |         |
| Panagiotis Tsatsios | 01  | 01/08/2024     |       | 8 of 13 |

# CHAPTER 5 – VALIDATION/VERIFICATION EXECUTION

## 5.1 Evidence Collection and Sampling

After the initial examination of the documentation, the team identifies further topics and aspects (objective evidence) that must be investigated with the Organisation.

The process may also require an on-site visits when it is a requirement of the reference scheme/program and in other cases, at Verum et Accuratus' discretion, depending on the nature of the claim.

The date (s) of the site visit (s) is/are agreed with the Organisation sufficiently in advance and will be/will be officially confirmed at least one week before through the Validation/Verification Plan.

If, during the examination of the documentation, doubts or problems arise that cannot be resolved without a visit to the Organisation, the team will still have to make this on-site visit to resolve any necessary clarification.

Validation/verification is carried out on the basis of sufficient sampling to verify the reliability of data and information.

During the validation/verification activity, team members may also collect information through:

- a) interviews;
- b) observations of processes and activities;
- c) review of documentation and records.

## 5.2 On-Site Activities and Accompaniment

During the execution of the validation/verification activities on site, each team member must be accompanied by a guide designated by the Organisation to facilitate the execution of the validation/verification and who may have the following responsibilities:

- a) establish contacts and times for interviews;
- b) organise visits to specific parts of the site or Organisation;

c) ensure that the rules regarding site security and safety procedures are known and respected by members of the validation/verification team;

- d) assisting on site validation/verification on behalf of the customer;
- e) provide clarification or information at the request of a team member.

# 5.3 Reporting and Findings Management

For each validation/verification, a written report can be prepared, in which any findings are indicated. The Organisation may indicate any reservations or comments it may have regarding the findings made by Verum et Accuratus verifiers.

If evidence comes to Verum et Accuratus' attention that leads it to believe that there is an intentional inaccuracy or non-compliance of the party responsible for the claim with laws and regulations, Verum et Accuratus reserves the right to inform the appropriate parties as soon as possible.

## 5.3.1 Corrective Actions and Proposal Review

After analysing the causes of any findings, and on the basis of their classification, the Organisation must propose to Verum et Accuratus, by the date and the methods established by the reference scheme/program, the necessary treatments as well as the corrective actions and the times required for their implementation. Verum et Accuratus will review the corrective action proposals of the Organisation and communicate their acceptance and if necessary plan an additional time aimed at verifying the effectiveness of the corrections and proposed corrective actions.

| Verum et Accuratus  | QUALITY SYSTEM PROCEDURES                 |                |       |       |
|---------------------|---|----------------|-------|-------|
|                     | General Rules for Validation/Verification |                |       |       |
|                     | Effective date: 01/08/2024                |                |       |       |
|                     |   |                |       |       |
| True & Accurate     |   |                |       |       |
| Authorised by:      | Revision No.:                             | Revision Date: | Page: |       |
| Panagiotis Tsatsios | 01  | 01/08/2024     | 9 0   | of 13 |

The additional time can be spent on site at the Organisation or on a documentary basis based on the type of corrective actions to be verified in the judgment of the validation/verification team.

All expenses relating to any additional time deemed necessary for the management of the findings are agreed and to be considered borne by the Organisation.

## 5.3.2 Validation/Verification Process Suspension

Verum et Accuratus reserves the possibility to suspend the validation/verification process in case of particular critical issues, which may be findings that the Organisation is unable to manage and/or other requirements envisaged by the individual scheme/program that the Organisation is unable to comply with.

## 5.4 Conclusion and Review

The conclusion on the outcome of the activities, a draft validation/verification statement and the final report prepared by the team (if applicable) are subject to a review to confirm that:

a) all validation/verification activities have been completed in accordance with the contract and the reference scheme/program;

b) there is sufficient and adequate evidence to support the decision;

c) the significant findings have been identified, resolved and documented.

| Verum et Accuratus  | QUALITY                                   | <b>Y SYSTEM PROCED</b> | URES  |          |
|---------------------|---|------------------------|-------|----------|
|                     | General Rules for Validation/Verification |                        |       |          |
|                     | Effective date: 01/08/2024                |                        |       |          |
|                     |   |                        |       |          |
| True & Accurate     |   |                        |       |          |
| Authorised by:      | Revision No.:                             | Revision Date:         | Page: |          |
| Panagiotis Tsatsios | 01  | 01/08/2024             | -     | 10 of 13 |

# <u>CHAPTER 6 – DECISION AND ISSUE OF THE VALIDATION/VERIFICATION</u> <u>STATEMENT</u>

## 6.1 Statement Issuance

At the end of the validation/verification process, Verum et Accuratus decides whether or not to confirm the claim.

Based on this decision, a validation/verification statement is issued or not based on the requirements of the scheme/program.

The validation/verification statement:

- a) indicates the customer's name;
- b) identifies whether it is a validation statement or a verification statement;
- c) refers to the claim, including the date or period covered by the claim;

d) describes the objectives and scope of validation/verification;

e) describes whether the data and information supporting the claim were hypothetical, projected and/or historical in nature;

f) includes a reference to the validation/verification scheme/program and associated specific requirements;

g) includes the decision made regarding the claim, including the fulfilment of all the requirements relating to the scheme/program (e.g. materiality or level of assurance);

h) indicates the date and univocal identification of the statement;

i) includes any findings that were not closed before the issue of the validation/verification statement, if required by the scheme/program;

j) includes any other information/references to technical specifications, if required by the scheme/program.

#### 6.2 Statement Non-Issuance

When on the basis of the decision, the validation/verification statement is not issued, VERUM ET ACCURATUS informs the Organisation.

| Verum et Accuratus  | QUALITY SYSTEM PROCEDURES                 |                |       |          |
|---------------------|---|----------------|-------|----------|
|                     | General Rules for Validation/Verification |                |       |          |
| $\otimes$           | Effective date: 01/08/2024                |                |       |          |
| True & Accurate     |   |                |       |          |
| Authorised by:      | Revision No.:                             | Revision Date: | Page: |          |
| Panagiotis Tsatsios | 01  | 01/08/2024     |       | 11 of 13 |

# **CHAPTER 7 – MODIFICATION AND WITHDRAWAL OF THE STATEMENT**

## 7.1 Request for Modification or Extension

The Organisation holding of the validation/verification statement can request a modification or extension by submitting a new validation/verification request, accompanied by the documentation referred to in point 3.1 duly updated.

Verum et Accuratus reserves the right to examine the requests on a case-by-case basis and to decide how to evaluate for issuing a new validation/verification statement, in accordance to the scheme/program of reference for the claim.

## 7.2 Notification of Changes

For the entire duration of the contractual relationship, the Organisation must promptly notify Verum et Accuratus of any changes that have occurred on aspects that may affect the ability of the claim to continue meeting the requirements of the scheme/program used for validation/verification.

If new facts or information that could materially affect the validation/verification statement are discovered after the issue date, Verum et Accuratus will:

a) communicate the matter as soon as practicable to the Organisation and, if required, the scheme/programme owner;

b) take appropriate action, including the following:

- 1) discuss the matter with the Organisation;
- 2) consider if the validation/verification statement requires revision or withdrawal.

If the validation/verification statement requires a revision, Verum et Accuratus implements the processes to issue a new version of the statement which includes the specification of the reasons for the revision. These may include repeating the relevant stages of the validation/verification process.

In the event of a revision of the statement, Verum et Accuratus can also communicate to other interested parties that the use of the original statement can now be compromised given the new facts or information that has emerged.

## 7.3 Notification of Changes in Regulations

Verum et Accuratus promptly notifies the Organisation of any change in the reference schemes/programs or in the Verum et Accuratus regulations for validation/verification.

# 7.4 Further Investigations

Verum et Accuratus reserves the right to conduct further insights on a documentary basis and/or with an onsite visit to the Organisation at short notice or without notice, should any complaints be received.

| Verum et Accuratus  | QUALITY SYSTEM PROCEDURES                 |                |       |          |
|---------------------|---|----------------|-------|----------|
|                     | General Rules for Validation/Verification |                |       |          |
|                     | Effective date: 01/08/2024                |                |       |          |
|                     |   |                |       |          |
| True & Accurate     |   |                |       |          |
| Authorised by:      | Revision No.:                             | Revision Date: | Page: |          |
| Panagiotis Tsatsios | 01  | 01/08/2024     |       | 12 of 13 |

# CHAPTER 8 - COMPLAINTS AND APPEALS MANAGEMENT

Verum et Accuratus strives to offer high quality services, meeting and exceeding clients expectations.

It remains however a remote possibility that a client may feel the need to file a complaint / appeal, about a matter which is the responsibility of Verum et Accuratus,.

To facilitate such a complaint / appeal process covering the proper filing, fair investigation and justified response within specified timeframes for a complaint / appeal, Verum et Accuratus has established, maintains and implements a Complaints & Appeals Procedure.

The VA Complaints & Appeals Procedure guarantees that any filed complaint / appeal will be received in an appropriate form, accompanied by any supporting evidence client considers necessary to back their claim. The investigation of a complaint/ appeal will commence once client confirms / declares in writing that the filed claim's form and supporting documentation is considered complete and sufficiently justified.

The procedure further guarantees a fair investigation of any complaint / appeal and a detailed justified response to it in writing, within a specific timeframe.

## A complaint / appeal can be filed using one of below methods:

- -online, via the relevant electronic complaint / appeal form on our website, which also provides ability to submit attachments
- -via email, to info@vaverifiers.com, in free format and by attaching any supporting documentation deemed necessary
- -verbally, via telephone / online call, in which case VA appointed responsible personnel (non-related to the specific case to be investigated) will register your complaint / appeal, advise you on any necessary supporting documents and guide you through the process

Irrespective of the method a client choses to file a complaint / appeal, it is highly recommended to refer to the below Complaints & Appeals Procedure, which provides guidance on how to file a complaint / appeal, as well as details of how a claim is investigated fairly, and the timeframe for the written response to it from Verum et Accuratus.

The Organisation can appeal against the decisions of Verum et Accuratus, setting out the reasons for the dissent, within two months from the date of notification of the decision.

Verum et Accuratus has established, implements and maintains a relevant Procedure for Handling Appeals and/or Complaints, which is duly published on our website **vaverifiers.com**.

Verum et Accuratus will keep the Organisation informed of the progress in evaluating the complaint or appeal, will investigate the matter and specify its proposed actions in response to the complaint or appeal within 10 days of its receipt.

The reply must adequately describe company investigation results regarding the complaint.

Customer response may be needed to assist / complete Verum et Accuratus investigation.

If the customer does not respond to requests for such information within thirty (30) days the complaint may be considered closed.

If justified complaints are received by Verum et Accuratus against a validated/verified claim, Verum et Accuratus reserves the right to carry out a verification on the validated/verified claim itself, aimed at checking the correct handling of the complaint. If the complaint proves to be well founded and of high gravity, Verum et Accuratus reserves the right to suspend, withdrawal or modify the validation/verification statement.

The cost of the verification that Verum et Accuratus carries out on the basis of the complaint, if justified, is borne by the Organisation owning the validated/verified claim.

| Verum et Accuratus  | QUALITY SYSTEM PROCEDURES                 |                |       |          |
|---------------------|---|----------------|-------|----------|
|                     | General Rules for Validation/Verification |                |       |          |
|                     | Effective date: 01/08/2024                |                |       |          |
|                     |   |                |       |          |
| True & Accurate     |   |                |       |          |
| Authorised by:      | Revision No.:                             | Revision Date: | Page: |          |
| Panagiotis Tsatsios | 01  | 01/08/2024     |       | 13 of 13 |

# **CHAPTER 9 - CONTRACTUAL CONDITIONS**

For the contractual conditions and for anything not provided for in these Rules, the provisions are available on the website **vaverifiers.com**.