

Re Carbon Gözetim Denetim ve  
Belgelendirme Ltd. Şti.

Kızkulesi Sokak 28/3  
TR / 06700 Kazım Özalp Mah. -  
Çankaya – Ankara

Tel.: 0090-312-287 5122  
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## Company Structure and Allocation of Responsibilities Procedure




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Prepared by

Aslı Bingöl  
Quality Manager

Approved by

Christian Johannes  
General Manager

Re Carbon Gözetim Denetim ve Belgelendirme Ltd. Şti. Kızkulesi Sokak 28/3 TR / 06700 Kazım Özalp Mah. - Çankaya – Ankara Tel.: 0090-312-287 5122 Fax: 0090-312-287 3373	<b>Company Structure and Allocation of Responsibilities Procedure</b>	 quality in carbon auditing
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## 1. Purpose

The purpose of this procedure is to explain the company structure and the allocation of responsibilities within Re Carbon Ltd.

## 2. Responsibility

- General Manager
- Quality Manager
- Certification Manager
- Sales Manager
- All validation/verification team members
- All committee members

## 3. Application

### 3.1. Company structure

**Re Carbon Gözetim Denetim ve Belgelendirme Limited Şirketi**, Trade Registration No: 386836, is a member of Ankara Chamber of Commerce and is a legal entity that is legally accountable for the services it provides. The General Manager has the sole signatory rights on behalf of the company.

In line with the relevant legal regulation in Turkey, the essential element of establishing an operational company is to publish the company name on Trade Registry Gazette and to get approval from the relevant Chamber of Commerce along with the registration number. Therefore, since Re Carbon Gözetim Denetim ve Belgelendirme Limited Şirketi (hereafter referred to as Re Carbon Ltd. or Re Carbon) has its own trade registration number, it is a legal entity in Turkey which can enter into contracts, can make decisions independently and may be sued in its own name. A copy of the Trade Registry Gazette with “Re Carbon Gözetim Denetim ve Belgelendirme Limited Şirketi” as company name and the notary authorization is available and stored in the office.

The current shareholder structure of Re Carbon Ltd. established in September 2015 is as follows:

-100% belonging to- Mr. Christian Johannes

Re Carbon Ltd.’s contact information is as follows:

**Address:** Kızkulesi Sokak 28/3 – TR / 06700 Kazım Özalp Mah. – Çankaya - Ankara

**Phone:** 0090 312 287 5122

**e-mail:** [info@re-carbon.net](mailto:info@re-carbon.net)


**Website:** [www.re-carbon.net](http://www.re-carbon.net)

**Tax Office:** Cumhuriyet Tax Office

**Tax no:** 734 083 5498

The scope of activities of Re Carbon Gözetim Denetim ve Belgelendirme Ltd. Şti. is defined in the Trade Registry Gazette and is as follows:

- To act as an auditing, validation/verification and certification body within the context of GHGRSs
- To act as a third-party auditing and certification body within the context of calculation, reporting and verification of carbon and water footprint, sustainability, carbon markets and emission reduction projects
- To provide validation and verification/certification and third-party auditing services within the context of the standards relevant to greenhouse gas emissions, sustainability and corporate social responsibility including ISO 14064 series standards, ISO 14067 and PAS 2050 Product Carbon Print Standard, Carbon

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Disclosure Project (CDP), ISO 50001, SA 8000 Corporate Social Responsibility Standard.

There is a (dormant since 2021) related body of Re Carbon Ltd. named “re-consult Rüzgar Enerjisi Danışmanlık İç ve Dış Ticaret Limited Şirketi” (hereafter referred to as re-consult Ltd.) with the Trade Registration No: 226211, which has the same common ownership and/or governance, management personnel (Sales Manager, Quality Manager), shared resources with Re Carbon Ltd. The scope of activities of re-consult Ltd. is as follows:

- Wind Laboratory and Wind & Field Department: These departments within re-consult perform the following duties:
  - Technical Development (Wind measurements, risk analysis of the selected project sites, technical due diligence)
- Permits Department: This department within re-consult performs the following duties:
  - Generation License (Application and follow-up, EIA)
  - Planning permission (Change of development plans)
  - Grid connection (System use and connection agreements)
  - Land securing (expropriation, easement)
- Sales: This department within re-consult performs the following duties:
  - Executing sales of technical development services and other relevant by products for wind power plant projects
  - Market Analysis Report (a review report on actors in the wind energy sector)

The following services offered by re-consult are subcontracted:

- Construction Feasibility (Turbine procurement, detailed wind farm design)
- Bank’s/owner’s engineer (accompany the bank at the selected site for financing the project)
- Construction & commissioning (BoP tendering, supervision of civil works and turbine erection, commissioning of wind farm)
- Wind farm operation (wind forecasting, melogale (analysing software))

The procedures Re Carbon have in place are documented for all activities carried out by the Company which was established independently from all activities of re-consult Ltd. Thus, validation/verification activities are executed within the framework of impartiality and confidentiality policies.


In light of this information, any activity regarding consultancy, training and financing of GHGRS projects is not carried out in the context of neither in Re Carbon Ltd. nor re-consult Ltd. This is confirmed in the Management’s Impartiality Statement, available in the “**Conflict of Interest Assessment Procedure**”.

Validation/verification services are not offered for projects that are owned by companies who have been a client of re-consult within the past three years. This is also confirmed in the Management’s Impartiality Statement available in the “**Conflict of Interest Assessment Procedure**”.

### 3.2. Liability and financing

A legally binding service agreement is signed with a project participant prior to starting any service depending on the service and GHG program type.

Liabilities in terms of Re Carbon Ltd.’s validation/verification activities are covered by a liability insurance policy. In addition, full responsibility for all validation/verification activities, decisions and validation/verification opinions is taken by Re Carbon Ltd.

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The balance sheets of each year are prepared and kept as a record of evidence of financial resources by the internal accountant; one copy is sent to the General Manager. Therefore, the financial resources and stability required for handling validation and/or verification/certification services are followed and demonstrated.

### 3.2.1. Financial liability analysis

The liability insurance warranties regarding the validation/verification activities are checked through an annual financial liability analysis. The analysis is being conducted by the Sales Manager to analyze whether it covers Re Carbon Ltd.'s losses, when necessary, in full regarding the activities carried out.

This analysis is recorded in the “**Financial Liabilities Analysis Form**”, approved by the General Manager and is maintained by the Certification Manager in line with the “**Control of Records Procedure**”.

The insurance companies or their agents are contacted by the General Manager in line with the amount of annual warranty determined by this analysis. The insurance company providing the required warranty is selected by the General Manager and the liability insurance policy is arranged with this company for the respective year.

One copy of the liability insurance policy is kept by the Quality Manager.

### 3.3. Pending judicial processes

The records of all the judicial processes pending against Re Carbon are maintained by the company lawyer. If the subject matter of the case is such that it is incompatible with Re Carbon functions as a VVB, then the Accreditation Body is informed by the General Manager. This is also confirmed in the **Validation & Verification Policy** available in the “**Validation SOP**” and “**Verification SOP**”.

The copy of the file containing the records of resulted judicial processes regarding the Company's validation/verification activities are kept by the General Manager.

In case of a lawsuit against Re Carbon at any time during its accreditation or re-accreditation process, the General Manager informs the Accreditation Body (ANAB) accordingly.

### 3.4. Allocation of responsibilities and internal communication


For all positions shown in the organisational chart, the necessary qualification requirements with respect to education, training, experience and skills required for the duty, are listed in detail in the related “**Job Descriptions**”. An appointment to a position is performed when the qualifications required for the job, as defined in the job descriptions, are met.

Summary of the allocation of responsibilities based on positions within context of Re Carbon Ltd. is given in Annex-1.

All personnel records such as education, training, experience and skills are kept updated. In order to improve the competency of personnel, training and development targets are defined during the Management Review Meeting.

Planned and unplanned trainings for Re Carbon personnel are organised in line with the principle of “continuous improvement” and in order to raise the competencies of the personnel in line with the “**Personnel Appointment, Training and Performance Assessment Procedure**”. The effectiveness of these trainings is evaluated consistently.

The responsibilities regarding the validation/verification activities are given in the **Validation/Verification Process Flow Chart**.

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The responsibilities for the activities within Re Carbon Ltd. Şti are given in the **Operation Flow Chart**.

In compliance with our validation & verification policy, it is the management's responsibility to provide adequate resources to ensure that all employees carry out their responsibilities and apply and improve the quality management system.

In order to ensure that our validation & verification policy, its objectives and the quality management system as well as the impartiality requirements are understood at all levels of Re Carbon Ltd., the following are implemented:

- The “**Validation & Verification Policy**” available in Annex-1 of the “**Validation/Verification SOP**”s and the “**Management’s Impartiality Statement**” available in Annex-1 of the “**Conflict of Assessment Procedure**” are shared with all new full time and/or external contracted personnel during the orientation training. This is recorded in the “**QMS Orientation Training Plan**”. It is also stated in all full time and external personnel work agreements to comply with internal validation and verification policy, procedures and quality management system.
- Besides that, the “**Validation & Verification Policy**” is reviewed during each Management Review Meeting and revised, if necessary. The revised “**Validation & Verification Policy**” is communicated to the validation/verification team members through the formal information sharing (FISH) and/or in the experience and information exchange meeting. The required confirmation is also obtained from the relevant personnel via confirmation email and/or signature depending on the scope of the changes.

### 3.5. Changes in organizational structure

The organizational structure listed in the **Re Carbon Organizational Chart** is reviewed and updated, if needed, by the General Manager.

Any changes in the:

- management, key personnel and organizational structure,
- legal, commercial, ownership, or organizational status
- resources and locations,
- scope of accreditation,
- main policies, processes, and procedures, and
- other matters that will affect the Re Carbon’s ability to meet the accreditation requirements are notified to ANAB by the Quality Manager within 30 days of its implementation.

### 3.6. Information to be made available to the Accreditation Body(ies)

Quality management system documentation is submitted to the ANAB by the Quality Manager during (re)accreditation application or before the surveillance audit

The system documentation is updated by the Certification Manager, the Sales Manager and the Quality Manager in line with their responsibilities to reflect any changes in the related accreditation requirements.

### 3.7. Information to be made publicly available

The following information and documents are published on Re Carbon Ltd.’s or on the UNFCCC web site:

- A list of all GHGRS projects for which validation or verification/certification activities have been carried out by Re Carbon
- Information obtained from the project participants marked as proprietary or confidential is not disclosed

without the written consent of the provider of the information, except as required by national law. However, information used to determine Additionality as defined in paragraph 43 of Decision 3/CMP.1, to describe the baseline methodology and its application, and to support an environmental impact assessment referred to in paragraph 37 (c) of the same, is not considered as “proprietary” or “confidential” and is made publicly available


- The PDD and the monitoring reports obtained from the project participants (by giving a link)
- Validation and verification reports prepared by Re Carbon (by giving a link)
- Certification reports prepared by Re Carbon (by giving a link)
- Management’s Impartiality Statement (in form of a downloadable, secured pdf file)
- Company Structure and Allocation of Responsibilities Procedure (in form of a downloadable, secured pdf file)
- Re Carbon Organizational Chart (in form of a downloadable, secured pdf file)
- Handling of Complaints and Appeals Procedure (in form of a downloadable, secured pdf file)
- External Complaint Form and guidance information (in form of a Word file)
- Short CVs of validation/verification team members (in form of a downloadable, secured pdf file)

### 3.8. Records management

All records pertaining to the company structure and allocation of responsibilities are kept in line with the “**Control of Records Procedure**”.


## 4. Related Documents

- ISO 14065:2020, Clause 5
- ISO 17029:2019, Clause 5
- ANAB AG 1008 Terms and Conditions for Accreditation
- SOP-C-03 Validation Standard Operation Procedure – GS
- SOP-C-04 Verification Standard Operation Procedure – GS
- SOP-C-05 Validation Standard Operation Procedure – VCS
- SOP-C-06 Verification Standard Operation Procedure – VCS
- SOP-C-07 Validation Standard Operation Procedure – GCC
- SOP-C-08 Verification Standard Operation Procedure – GCC
- SOP-C-09 Validation Standard Operation Procedure – ICR
- SOP-C-10 Verification Standard Operation Procedure – ICR
- P-C- 02 Personnel Appointment, Training and Performance Assessment Procedure
- P-C- 03 Conflict of Interest Assessment Procedure
- P-C- 11 Control of Records Procedure
- CH-C-01 Re Carbon Organization Chart
- CH-C-02 Validation/Verification Process Flow Chart
- CH-C-03 Operation Flow Chart
- Occupational Liability Insurance Policy
- F-C-047 Financial Liabilities Analysis Form

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### Annex-1 Allocation of Responsibilities

Function(s)	Responsible Person
<ul style="list-style-type: none"> <li>• Formulation and development of policy matters relating to the operations of Re Carbon Ltd.</li> <li>• Supervision and monitoring of implementation of policies and procedures and administrative matters</li> <li>• Providing adequate and competent human resources for validation/verification functions related to the related GHGRSs</li> <li>• Allocation of responsibilities within the company</li> <li>• Final approval of all internal procedures</li> <li>• Execution of all payments</li> <li>• Monitoring of human resources sufficiency (Jointly with the Certification Manager)</li> <li>• Analysing and determining the human resource requirements</li> <li>• Final employment decisions on validation and/or verification team members</li> <li>• Signing appointment certificates (Joint responsibility with the Certification Manager)</li> <li>• Evaluating and qualifying the personnel (For full time management personnel)</li> <li>• Managing all functions including impartiality-related activities</li> <li>• Checking and approving the annual training plan prepared by the Certification Manager</li> <li>• Involving in Re Carbon Ltd. Şti risk analysis</li> <li>• Involving in the Management Review Meeting</li> <li>• Renewal of occupational liability insurance policy regarding validation/verification activities</li> <li>• Keeping the records of occupational liability insurance policies regarding validation/verification activities</li> <li>• Keeping the balance sheets records</li> <li>• Extending the duration of the confidentiality and impartiality agreements of Impartiality Committee Members</li> <li>• Informing the Accreditation Body(ies) in cases of any judicial processes</li> </ul>	<p><b>General Manager</b></p>
<ul style="list-style-type: none"> <li>• Establishment &amp; maintenance of the validation &amp; verification quality management system in line with policies formulated (Jointly with the Certification Manager and the Sales Manager)</li> <li>• Ensuring that procedures and other related documentation are in compliance with the related accreditation standards' requirements (Jointly with the Certification Manager and the Sales Manager)</li> <li>• Monitoring of the implementation of policies and procedures</li> <li>• Implementing the related quality management system requirements</li> <li>• Control of implementation of the related accreditation requirements (Jointly with the Certification Manager)</li> <li>• Documentation of policies and procedures</li> <li>• <u>Notifying the Accreditation Body within 30 days of significant or material changes in the Company</u></li> <li>• Publishing the QMS documents on the server</li> <li>• Assigning accessibility rights to selected project folders on the server for V/V team members and ITRs (Jointly with the Sales Manager)</li> <li>• Organizing and handling Re Carbon Ltd. Şti. risk analysis meetings</li> <li>• Handling of internal audits in terms of quality management system and related accreditation standards' requirements</li> <li>• Organizing the Management Review Meeting and reporting the outcomes</li> <li>• Follow-up of the completion of the revisions required to be handled regarding the newly introduced or revised rules and requirements of the Accreditation Body(ies)</li> <li>• Checking and following-up about any changes (when and if occurs) within the requirements in the related Accreditation Standard(s) and informing the Certification Manager about such changes</li> <li>• Reflecting the quality management system (e.g. management review, internal audit) related revisions, if any, in external documents into Re Carbon's internal documentation</li> </ul>	<p><b>Quality Manager</b></p>
<ul style="list-style-type: none"> <li>• Establishment of quality management system in line with policies formulated and related standard requirements (Jointly with the Sales Manager and the Quality Manager)</li> <li>• Supervising implementation of validation and/or verification/certification procedures (Jointly with the Quality Manager)</li> <li>• Analysing and determining the human resource requirements (Jointly with the General Manager)</li> <li>• Implementing overall quality management system (Jointly with the Quality Manager and the Sales Manager)</li> </ul>	<p><b>Certification Manager</b></p>

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Function(s)	Responsible Person
<ul style="list-style-type: none"> <li>• Verifying the competence validation and/or verification team members and independent technical review personnel</li> <li>• Giving evaluation and qualification decision for the personnel during the employment and appointment process (For V/V team members and ITRs, along with one full time team leader)</li> <li>• Signing appointment certificates (Joint responsibility with the General Manager)</li> <li>• Handling <u>review and</u> approval process of the VVC reports</li> <li>• Retaining personnel records including updated CVs through the relevant template and training records of validation/verification team members and ITRs</li> <li>• Preparing the annual training plan based on the decisions taken regarding the planned trainings during last management review meeting</li> <li>• Checking and reviewing the prepared annual training plan in the last quarter of the mentioned year (preferably in the second half of December)</li> <li>• Retaining of training records of management and support personnel relevant with Re Carbon activities</li> <li>• Maintaining competence level of validation and/or verification/certification personnel and arranging any necessary trainings</li> <li>• Monitoring of human resources sufficiency (Jointly with the General Manager)</li> <li>• Evaluating the adequacy of competence criteria relevant with the validation and verification/certification functions</li> <li>• Participating Re Carbon Ltd. Şti risk analysis meetings</li> <li>• Deciding on and approving of validation and/or verification/certification reports and functions</li> <li>• Giving technical and procedural guidance on methodologies, clarifications and guidelines from UNFCCC, GS &amp; VCS <u>and other GHGRSs</u> (Jointly with V/V team members and ITRs)</li> <li>• Monitoring of changes and control of implementation of accreditation requirements (Jointly with the Quality Manager)</li> <li>• Handling of experience <u>and information</u> exchange meeting with the Team Members</li> <li>• Involving in the Management Review Meeting</li> </ul>	
<ul style="list-style-type: none"> <li>• Establishment and Maintenance of the quality management system in line with policies formulated and related standard requirements (Jointly with the Certification Manager and the Quality Manager)</li> <li>• Assessing validation/verification service applications</li> <li>• Conducting validation/ verification/ certification contract review and quotation preparation</li> <li>• Selecting validation and/or verification team members and independent technical review personnel for each project by using the Table of Competence</li> <li>• Handling and tracking of personnel availability for the validation/verification activities (For V/V team members and ITRs)</li> <li>• Creating project folders on the server for each project</li> <li>• Handling of individual impartiality declarations by V/V team members and ITR (prior to any V/V assignment)</li> <li>• Handling of communications related to invoices issued by the Accreditation Body(ies)</li> <li>• Supervising and controlling the validation/verification team</li> <li>• Monitoring of project stages</li> <li>• Sending out, receiving and filing customer feedback forms with project participants after the completion of each project</li> <li>• Implementing overall quality management system (Jointly with the Certification Manager and the Quality Manager)</li> <li>• Uploading and updating the required documents and/or information on Re Carbon website for public availability including projects' related information</li> <li>• Retaining complaints/disputes/appeal records</li> <li>• Retaining project tracking list</li> <li>• Participating to Re Carbon Ltd. Şti. risk analysis meetings</li> <li>• Involving in the Management Review Meeting</li> </ul>	<p><b>Sales Manager</b></p>
<ul style="list-style-type: none"> <li>• Supervision of finance</li> <li>• Monitoring income and expenditure to determine financial stability</li> <li>• Assessment of projects' budgets and handling of cost control</li> <li>• Preparing the validation/verification activities annual financial liability analysis (Jointly with General</li> </ul>	<p><b>Accountant</b></p>



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Function(s)	Responsible Person
<p>Manager)</p> <ul style="list-style-type: none"><li>Preparing and keeping the balance sheets records for each year</li></ul>	
<ul style="list-style-type: none"><li>Assessing the validity of complaints</li><li>Investigating and reviewing the case</li><li><u>Informing the related party about the result</u></li></ul>	<b>Complaints Committee</b>
<ul style="list-style-type: none"><li>Assessing the validity of appeals</li><li>Investigating and reviewing the case</li><li>Final decision on appeals</li></ul>	<b>Appeals Committee</b>
<ul style="list-style-type: none"><li>Analysis of actual and potential risk to impartiality</li><li>Preparing an annual report of its activities</li><li>Reviewing and approving all risk analysis <u>related to impartiality</u></li><li>.</li></ul>	<b>Impartiality Committee</b>
<ul style="list-style-type: none"><li>Acting as a Team Leader for validation/verification functions and coordination of these functions</li><li>Monitoring and reviewing the performance of validator(s), verifier(s), technical expert(s)</li><li>Monitoring the performance of other team leaders by witness audits</li><li>Giving evaluation and qualification decision for the personnel during the employment and appointment process (For V/V team members and ITRs, along with the Certification Manager)</li><li>Preparing the validation/verification plans</li><li>Communicating validation/verification <u>assessment</u> plans with project participants</li><li>Updating of all related project records on the company server</li><li>Submitting all necessary documents to Certification <u>Management Department</u> required for the registration/issuance request</li><li>Involvement in the employment evaluations of the V/V team members during the employment process, if necessary</li><li>Conducting initial on the job evaluations (For v/v team members)</li><li>Following methodologies, tools, clarifications and guidelines from UNFCCC, GS &amp; VCS <u>and other GHGRSs</u> (Jointly with the Certification Manager)</li><li><u>Implementing overall quality management system</u></li><li>Involving in the experience <u>and information</u> exchange meeting</li><li>Independent technical review of validation and/or verification/certification reports (For the ones qualified as an ITR)</li><li>Informing Certification <u>Management Department</u> when ITR is completed and when the project is ready for registration or issuance request (For the ones qualified as an ITR)</li></ul>	<b>Team Leader</b>
<ul style="list-style-type: none"><li>Acting as a validator/verifier for validation/verification functions</li><li>Supporting the team leader during the validation/verification functions</li><li>Following methodologies, tools, clarifications and guidelines from UNFCCC &amp; GHGRSs</li><li>Communicating validation/verification plans with project participants in case of a such request by the team leader</li><li>Involving in the experience <u>and information</u> exchange meeting</li><li><u>Implementing overall quality management system</u></li></ul>	<b>Validator/Verifier</b>
<ul style="list-style-type: none"><li>Acting as a technical expert for validation/verification functions depending on the specialized area</li><li>Supporting the team leader during the validation/verification functions</li><li>Following methodologies, tools, clarifications and guidelines from UNFCCC &amp; GHGRSs on his/her specialized field</li><li>Preparing and assessing the performance of the technical experts who had not been involved in the validation and verification/certification activities in the relevant year through a questionnaire (For the first Technical Expert appointed for the relevant technical area)</li><li>Updating the questionnaire used for the performance monitoring of the technical experts who had not been involved in the validation and verification/certification activities in the relevant year (For the first Technical Expert appointed for the relevant technical area)</li></ul>	<b>Technical Expert</b>

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#### History of the document

Version No.	Date	Summary of the revision	Prepared by	Approved by
00	23.01.2023	Initial publication of the procedure within Re Carbon Ltd. documentation in accordance with the requirements of ISO 14065:2020 and ISO/IEC 17029:2019 standards	Aslı Bingöl Quality Manager	Christian Johannes General Manager
01	23.09.2024	The procedure in general no longer contains the actions that must be taken in relation to CDM-related duties. General update has been made regarding responsibilities.	Aslı Bingöl Quality Manager	Christian Johannes General Manager