

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	Conflict of Interest Assessment Procedure	
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Management's Impartiality Statement

RE Carbon Ltd. and its stakeholder(s) understand and recognize the importance of impartiality, independence, objectivity and integrity in carrying out validation, verification and related conformity-assessment activities. RE Carbon Ltd. is committed to maintaining impartiality and preventing actual, potential or perceived conflicts of interest at all times through the implementation of its management system, operational procedures, risk-management activities and oversight mechanisms.

RE Carbon Ltd. therefore commits to the following principles:

- RE Carbon Ltd. operates as an independent third-party validation and verification body and performs all activities impartially, objectively and professionally under all circumstances.
- The Company solely performs independent validation, verification and related conformity-assessment activities and does not provide consultancy, project-development, financing or implementation services related to greenhouse gas project activities.
- The Company maintains only professional and operational relationships necessary for the execution of independent validation, verification and related conformity-assessment activities.
- The Company does not make or imply any claims that validation or verification activities would become simpler, faster or more favorable through the use of any specific consultant, project developer or third party.
- All activities are conducted under established procedures intended to safeguard impartiality, prevent conflicts of interest and protect the integrity of applicable accreditation requirements and greenhouse gas reporting schemes (GHGRSs).
- Where any internal or external personnel has had a professional, financial, employment-related or consultancy-related relationship with a project participant within the previous 3 (three) years, such relationships shall be evaluated in accordance with the applicable conflict-of-interest and risk-management procedures of RE Carbon Ltd.
- Where such relationships involve personnel with decision-making, approval or oversight authority, including the General Manager or Certification Manager, RE Carbon Ltd. shall evaluate whether the engagement may be accepted, restricted, reassigned or rejected in accordance with the applicable impartiality and conflict-of-interest requirements.
- Personnel who have been involved in consultancy, project development, financing, implementation or management of a project activity shall not participate in validation or verification activities for that project.
- All personnel are required to disclose any actual, potential or perceived conflicts of interest prior to assignment and throughout the applicable engagement activities.
- Identified conflicts of interest shall be evaluated and managed in accordance with the applicable conflict-of-interest and risk-management procedures of RE Carbon Ltd., including implementation of mitigation measures, reassignment or removal of personnel where necessary.
- During validation and verification activities, RE Carbon Ltd. and its personnel shall not provide consultancy or design solutions intended to resolve identified deficiencies or influence project design, monitoring approaches or assessment outcomes.
- The Company does not establish financial, commercial or operational performance targets that could compromise impartiality, independence or technical objectivity.
- The income, compensation or evaluation of validation and verification personnel is not linked to the outcome of validation or verification activities.
- Payments for validation and verification services are not linked to the final opinion, findings or outcome of the assessment activities.
- As a general rule, RE Carbon Ltd. does not perform verification for projects it has previously validated. Where permitted by the applicable GHGRS, appropriate safeguards shall be implemented. Where the applicable GHGRS expressly permits the same audit team to perform combined validation and first verification, self-review risks shall be managed through documented impartiality assessments, independent technical review, independent certification decision and other applicable independence controls.
- As a general rule, RE Carbon Ltd. does not perform renewal of crediting period validation for projects for which it has conducted the most recent verification. Where permitted by the applicable GHGRS, appropriate safeguards and independence controls shall be implemented.
- Repeated assignment of the same personnel to the same project shall be periodically evaluated as part of the impartiality and familiarity-risk assessment activities of RE Carbon Ltd.
- RE Carbon Ltd. maintains an organisational structure, financial system, management system and operational framework intended to safeguard impartiality, independence and confidentiality at all times.
- All potential conflicts of interest and impartiality-related risks are systematically identified, analysed, evaluated and managed through documented procedures, conflict-of-interest reviews and risk-assessment activities.
- RE Carbon Ltd. additionally implements operational, ICT and information-security controls intended to protect the confidentiality, integrity and traceability of project information, electronic records, remotely obtained evidence and digital communications associated with validation and verification activities.
- All validation and verification conclusions are based solely on objective evidence obtained during the applicable assessment activities.
- Where actual, potential or perceived conflicts of interest cannot be adequately mitigated or controlled, RE Carbon Ltd. shall not undertake or continue the respective validation or verification engagement.

As RE Carbon Ltd., we ensure implementation of the above-mentioned principles through our policies, procedures, management-system controls, Impartiality Committee activities, conflict-of-interest assessments, contractual arrangements, risk-management activities and oversight mechanisms.

Christian JOHANNES
06.08.2026
General Manager