CARBON BORDER ADJUSTMENT MECHANISM

SENIOR MANAGEMENT COMMITMENT TO IMPARTIALITY AND INDEPENDENCE
CTR.FRM.CBAM.4.13

Ankara, Türkiye

As CTR senior management, we accept the ISO/IEC 17029 standard and we declare that in all validation and verification activities we carry out under the CBAM (Carbon Border Adjustment Mechanism) regulations (EU) 2023/956 and 2025/2551, we consider impartiality, independence and objectivity as the cornerstone of our institutional structure.

In this regard;

1. **Independence and Impartiality Responsibility:** We are ultimately responsible for the impartiality of our verification activities and are committed to not allowing commercial, financial or other pressures to influence our decisions at any stage of this process.
2. **Conflict of Interest Management:** CTR systematically analyzes and identifies potential threats to impartiality (personal interest, self-review, familiarity, and intimidation) for all staff, committee members, and external experts, and takes necessary measures to eliminate or minimize these risks.
3. **Consultancy Prohibition: We guarantee that we will not provide** any **consultancy services** (such as preparing a monitoring plan, drafting an emissions report, etc.) for the creation of a claim that we have verified under CBAM, and that we will not offer verification services on the same subject to clients to whom we have provided consultancy services.
4. **Separation of Duties:** To ensure transparency and accuracy in the verification process, we require that **the verification** , **review** , and **final decision-making** phases be carried out independently by personnel with different skill sets.
5. **Objective Evidence-Based Decision:** We declare that our validation opinions and statements will be based solely on sufficient and appropriate **objective evidence** collected throughout the validation/verification process .
6. **Public Interest and Transparency:** We conduct our activities in the public interest, and we keep our impartiality policy and complaint /appeal processes accessible to all relevant parties.
7. **Confidentiality and Professionalism:** We guarantee the confidentiality and professional secrecy of all information obtained or generated during the verification process through legal and contractual agreements.
8. **Personnel Statement:** We require all personnel on our verification team to declare any past or current relationships that could affect their impartiality; we will not employ personnel with potential conflicts of interest in relevant roles.

As CTR, we are committed to providing services in all sectors within our accreditation scope that are fully compliant with regulations, adhere to ethical values, and provide a reasonable level of assurance for all our stakeholders.

Verifier Organization Official
Name-Surname / Signature

