

CODE OF ETHICS

OUR BASIC VALUES

Professional ethical values are prerequisite for ALBERK; and all Alberk personnel obey them. This values ;

1- Integrity and ethic

- As ALBERK, we behave as graciously, honestly and justly.
- We provide the services without a hitch which we give the assurance.
- We submit the services as clearly indicated on the agreement, we don't give cause for any fault or failure.
- We follow up our company policy and procedures.
- ALBERK gives importance for information security and individual privacy.
- ALBERK respects national and international ethic values and accepts this ethic values as a guide for all activities.
- ALBERK has prepared all documents related with health and security conditions which is given importance by personnels and costumers and improves itself continuously by giving trainings regularly.

2- Impartiality and liberty

- ALBERK makes decision as unprejudicedly and impartially.
- ALBERK makes the reports with competent personnel as predicated on objective evidence.

3- Individual Respect

- ALBERK behaves to all personnels, costumers and third parties on the basis of respect rules.
- ALBERK acts by thinking reflexion of all behaviors.
- ALBERK always provides added value for given services and receives positive feedbacks.
- ALBERK gives service without any exception about religion, language, gender, financial status and political view.

4- Social and enviromental liability

- ALBERK and all personnels consider effects of given services on people, community and environment.

OUR BASIC PRINCIPLES

1- We stick to our ethic rules

The reason for our improvement and enlarge originate from our main priciples are perfomed without any exception to all personel, rivals, costumers, suppliers and business associates.

Our each personnel and manager know and apply the ethic rules regardless of working at any department.

2- Our all processes are managed with transparency, honesty and justice priciples.

Many activities aren't dependent on law, obligation or other mandatory requirements. Our transparency, honesty and justice priciples become a part in this kind of situations and become prominent for all activities of ALBERK. Understanding and implementing of this priciples are under all personnel responsibility. Any ALBERK personel can not behave as causing to break or tarnish our ethic rules and can not behave as making ALBERK unfair against to law and obligations in any way.

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APPLICABLE RULES

1- SERVICE INTEGRITY

As ALBERK, we should avoid the situations which may affect our independency or impartiality and should adopt principle of clarity and transparency. We should continue our work without being under the external influence while working honestly. We shouldn't submit to any pressure and effect.

Received information and test results are reported within the frame of honesty. Our reports and certificates are represented real findings and determined by based on professional personnels and received results. If our test methods cause a toleration limit in results, they used as not to deflecting real test findings by us.

2- RECEIVED DOCUMENT AND INTEGRITY OF INFORMATION

- Financial and accounting documents integrity

All financial and accounting information are performed to our accounts properly and shouldn't cause unproper implement. All inputs should have available evidence.

- Financial and accounting information internal control

The reason of internal control is testing of quality and reliability of the financial and accounting information provided. Each department manager is responsible for internal control in conformity with ALBERK procedures. Accountants ensure that data recorded in the system regularly, as monthly, quarterly and annual.

- Given information and reports integrity

Each employee is responsible for the documents and information personally supplied (including electronic copies). All employees are responsible at any level for reports, records done by themselves and reliability of information given by themselves. There may be financial reports, predictions, legal reports, research reports, fiscal charges and documents submitted to government or a body within the all documents supplied.

3- CONFLICT OF INTEREST

A conflict of interest occurs in which ALBERK's interests differ from personal interests. This situation should be avoided in case of influence giving judgement even if you are unaware of this.

It is vital for ALBERK to be independent and report any commitment which may cause a conflict of interest. We regulate all situations which may generate such conflicts.

4- OBSERVANCE OF CONFIDENTIALITY RULES

- Our costumers' information

All information supplied from all stages of our services are excepted confidential and recorded.

- Intellectual property rights

All technical information, system, invention and technological information supplied by ALBERK are provided the security by confidentiality agreements. The use of such information must be restricted to permitted professional purposes and must be only available for authorized personnels. All ALBERK employees are personally responsible from confidentiality information which must be kept within the limits of their power and they indicated as items in the contract of hiring.

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- Inside Information

Leaking information out by ALBERK employees related to new projects is prevented by located control mechanisms to required places. Inside information involves all information that has not been made public in ALBERK. ALBERK employees have information within the limits of their power. This information is kept as inside information and protected its confidentiality until making it public. By the reason of avoiding from this risk usage of device is limited to all personnels computers. In case of leaking confidential information out by ALBERK employees, legal transaction is started.

5- ANTI-BRIBERY RULES

As ALBERK, we reject all forms of bribery. We apply relevant local and international anti-bribery laws in all jurisdictions within which are established or perform services. By our internal procedures:

- We follow certain specific operations such as political contributions, charitable contributions and sponsorship.
- We regulate the offer or receipt of gifts, hospitality or expenses.
- We ensure to maintain accurate books and records which properly and fairly document all financial transactions.

6- DEALINGS WITH OUR BUSINESS PARTNERS

We shall seek to ensure that improper payments are not being channeled through international and local partners, subcontractors, ALBERK employees and other third parties. We continue our sale activities fairly and clearly. We monitor whether our partners behaviours are selective and ethic.

7- FAIR COMPETITION

As ALBERK, we are committed to competing fairly and in compliance with the applicable laws. In case of any doubt of companies and their managements illegal behaviors, any employee should seek advice from the department of administrative affairs. ALBERK must encourage total transparency when drafting commercial documents and promote the strength of ALBERK rather than highlighting the shortcomings or our competitors. We should avoid from denigrate speech and emphasize the services which our rival are unable to supply, when discussing with clients. Any ALBERK employee must not give guarantee for the services which we are not accredited.

8- COMMUNICATION WITH THE MEDIA AND INVESTORS

ALBERK; develops and supports active communications for customers, analysts, investors and public. All media activities are under general coordinator control. Complaints about media are received from general coordinator and transferred to related departments.

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IMPLEMENTATION OF THE CODE OF ETHICS

- **ALBERK DOCUMENTATION INVOLVES CODE OF ETHIC**

All ALBERK employees must monitor and obey documents indicated as in the followings

- 1- This Code of Ethic
- 2- ALBERK internal procedures
- 3- Any other internal local or technical rules relating to ethics matters

- **SCOPE OF IMPLEMENTATION**

The Code of Ethics are involve all ALBERK employees, subcontractors, key suppliers, third parties and services providers. As ALBERK we must ensure that they comply with the Code of Ethic.

- **ETHIC ORGANIZATION**

Technic and administrative affairs manager is responsible for obeying or not the ethic rules. Technic and administrative affairs manager takes parts in the staff. Each department responsables are charged with ethic rules monitoring in their department. In case of any diruption, they represent the report to technic and administrative affairs manager.

- **COMPLIANCE WITH THE CODE OF ETHICS RULES**

Compliance with the Code of Ethics rules shall be included in the performance evaluation of each employee. Inputs about code of ethics are reviewed at the management reviewing meeting and oriantation trainings. Any employee who fails to comply with the Code of Ethics shall be subject to disciplinary measures which may include the termination of his contract of employment. In any case the author of any violation shall have the right to be heard and defend himself.

All employee are supposed to report any request for, or offer of, an improper payment .

- Facts constitutaing evidence of violations or suspected violations of the Code may be reported by an employee to :
 1. The employee's direct line manager.
 2. ALBERK management.

No sanctions will be inflicted upon an employee who has reported an infraction in a justified manner and good faith. If he wants to kept his name as private , his name will be kept as confidential. However, anyone who takes part in a prohibited activity may be subject to the resulting disciplinary measure, even if he is the one to report it.

Compliance with the Code of Ethics shall be checked regularly by both internal and external auditors, who shall submit their conclusions to the Technic and administrative affairs manager.

For any questions or worries regarding implementation or interpretation of Code of Ethics, any employee is free to contact Technic and administrative affairs manager

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In case of any doubt of Alberk code of ethic rules, Alberk employees, subcontractors, suppliers and other third parties may send e-mail to yesim.yuksel@gatechnic.com addresses or may contact from the telephone number 0216 572 49 10 /121.