



**QA TECHNIC BUSINESS ETHIC AND  
COMPLIANCE PROGRAM  
(CODE OF ETHIC)**



# QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

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# QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

## PROGRAM OBJECTIVE

The objective of this Business Ethic and Compliance Program ("Program") is to enhance the status of QA TECHNIC by ensuring that it abides by the standards of professional conduct throughout its organization, including franchise holders, joint ventures or others using the QA TECHNIC name with its consent to assure its ethical behavior and the integrity of its services - hereafter referred to as "QA TECHNIC".

## I. QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PRINCIPLES

### 1. Integrity

QA Technic shall operate in a professional, independent and impartial manner in all its activities.

QA Technic shall carry out its work honestly and shall not tolerate any deviation from its approved methods and procedures. Where approved test methods make provision for tolerances in results, QA Technic shall ensure that such tolerances are not abused to alter the actual test findings.

QA Technic shall report data, test results and other material facts in good faith and shall not improperly change them, and shall only issue reports and certificates that correctly present the actual findings, professional opinions or results obtained.

### 2. Conflicts of interest

QA Technic shall avoid conflicts of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services.

QA Technic shall avoid conflicts of interest between QA Technic companies and/or divisions engaged in different activities but which may be providing services to either the same client or each other.

QA Technic shall ensure that its employees avoid conflicts of interest with the activities of QA Technic.

### 3. Confidentiality

QA Technic shall treat all information received in the course of the provision of its services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

### 4. Anti-bribery

QA Technic shall prohibit the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment.

QA Technic shall prohibit the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers, or employees of any such party, or government officials.

### 5. Fair marketing

QA Technic shall only present itself and conduct marketing, including any comparisons with or references to competitors or their services, in a manner that is truthful and not deceptive or misleading or likely to mislead.



# QA TECHNIC

## BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

### II. FUNDAMENTAL PINCIPLES

#### 1. INTEGRITY OF DOCUMENTS AND INFORMATION SUPPLIED

##### 1.1 Integrity Of Our Services

ALBERK must avoid situations in which our professionalism, independence or impartiality may be compromised. We are committed to examining and dealing with such situations openly and transparently. Our work shall be carried out honestly in a professional, independent and impartial manner, with no influence tolerated with respect to any deviation from either our own approved methods and procedures or the reporting of accurate results or findings. We must not bow to any pressure or influence to change our results or findings.

Data, test results and material facts shall be reported in good faith. Our reports, test results and certificates must accurately state the actual findings, professional opinion or results obtained. Through our processes and controls, we ensure the integrity of our services.

##### 1.2 Integrity Of Financial And Accounting Documents

All financial and accounting information must be duly and correctly recorded in books and accounts and should, in no case, be the subject of incomplete, erroneous or fraudulent treatment. All entries must be justified by the appropriate items of proof, in good faith. All documents must be stored in accordance with specified time intervals available at legislation.

##### 1.3 Internal Control Of Financial And Accounting Information

Internal control objectives are to ensure the quality and reliability of the financial and accounting information supplied. Each ALBERK business unit or department manager is responsible for internal control in conformity with ALBERK procedures.

Financial consultant must ensure that data recorded in the reporting system in particular at monthly, 3 months and for the end of year closure, are in line with the information due to be published.

##### 1.4 Integrity Of Audit Reports And information Supplied

All employees must ensure that such information and documents communicated to other employees and/or clients by them are reliable, true and relevant. (including electronic copies) Each ALBERK employee is personally responsible for all the provided information and for all the documents he or she produces, such as, but not limited, to reports, test results and certificates. This also applies, among other things, to information and documents in respect of human resources, finance, legal, tax and also documents submitted to governmental or regulatory authorities.



## QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

### 2. CONFLICTS OF INTEREST

A conflict of interest is a situation in which ALBERK's interests differ from personal interests, with those of close family or of persons with whom we are involved in a personal or business relationship. You should avoid such situations, which may influence your judgment even if you think your judgment is not influenced. It is vital for you to be independent and to report any commitment or link which may create a potential conflict of interest. Situations which may result in conflict of interest are pre-assessed and risk analysis had been generated accordingly. Risk analysis constitutes control precautions such as continuous control; realisation of required written commitment and direct prohibition.

Examples of situation which we regulate via Risk Analysis are listed below:

- Lead Auditor Training
- Representatives
- Consultants
- Full time Audit Team
- Freelance Audit Team
- Full time Personnel
- Certification Committee
- Upper Management of Certification Body
- Committee Safeguarding Impartiality
- Complaint and Appeal Committee
- Medical Devices- Mdd Subcontractor and Supplier Audits
- Regional Managers
- Alberk Qa Technic, International Technical Inspection Certification Survey Gmbh
- Alberk Qa Technic Inspection and Product Certification Services
- Calibration Services
- Testing Laboratory Services
- Supplier Audit Services
- Personnel Certification / Professional Competency
- Compliance with Confidentiality Principles

Assessment is released under these headlines ;

- Self-interest threats: threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.
- Self-review threats: threats that arise from a person or body reviewing the work done by themselves. Auditing the management systems of a client to whom the certification body provided management systems consultancy would be a self-review threat.
- Familiarity (or trust) threats: threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence.
- Intimidation threats: threats that arise from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor



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### 3. PROTECTION AND CONFIDENTIALITY OF CLIENTS' INFORMATION

All information received in the course of the provision of our services must be treated as, and must remain, strictly confidential. Provided information could only be communicated to third parties upon prior consent of client where necessary. Confidentiality agreement which is countersigned between ALBERK and its employees has confidentiality clauses constituting severe sanctions.

All ALBERK employees are personally committed to protect the information in their possession, and to ensure that it is kept confidential, on the other hand there are confidentiality commitments available within agreement countersigned between ALBERK and its subcontractors, suppliers. Confidentiality clauses continue to apply for employees even if they quit their jobs (Defined periods vary based on standard.) Everyone should ensure that the protection of such confidential information is secured by implementing locally adequate security measures, ensuring that access is restricted to authorized persons only, and that the documents are stored in designated secure areas and disposed in a secured manner. Server and computers of company is being secured by special firewall against information leakage. In case, problem may occur related with information confidentiality; upper management and Information Technology Responsible would be informed simultaneously so that potential source would be eliminated prior becoming a real problem.

#### 3.1 Intellectual Property Rights

Technical, commercial and financial information, software, methodologies, trade secrets, databases, inventions, know-how developed or acquired by ALBERK and information governed by non-disclosure agreements must be treated as (and must remain) strictly confidential. The use of such information must be restricted to permitted professional purposes, to the exclusion of personal purposes and should be shared with or given to authorized persons only. Instruction governing usage of Alberk logo and brand are communicated to clients via website and are communicated with its personnel via File-maker Quality Module software.

#### 3.2 Inside Information

Regarding ALBERK's new ongoing projects, information leakage is prevented by Applicable texts providing a number of mandatory mechanisms dedicated to prevent the act of insider Trading for ALBERK employees. As concerns ALBERK, inside information is defined as any information of a precise nature that has not been made public. Employees of ALBERK could have an access to inside information according to their authorisation and as long as the information is not made accessible to the public, this information is going to remain as inside information and keep its confidentiality. In order to prevent such a risk, certain precautions have to be taken every time that you hold Inside Information, computers of employees have been limited in terms of usage of device enabling data transfer from their computer. The use of this information for personal reasons, or, its disclosure to people not entitled to receive it can infringe the law on securities and the rules of ALBERK.



## QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

### 4. 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 we 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 and we keep them under control at all times.
- We regulate accurate records and notes in order to ensure that documentation belonging to all financial and accounting transactions are generated in an accurate and fair way.
- Situations which may result in conflict of interest have been prohibited. Such as gift, commission.
- All employees of ALBERK are prohibited from accepting any direct or indirect bribery (Money, gift, other interests) and this condition is guaranteed by agreements.
- ALBERK and its all employees are obliged to act in accordance with regulatory requirements regarding bribery and corruption for all geographical areas and territories where it provides its services.

### 5. DEALING WITH BUSINESS PARTNERS

By our anti-bribery and anti-corruption policies and procedures:

- We require that our business partners comply strictly with national and international anti-bribery and anti-corruption laws and regulations and we seek to ensure that improper payments are not being channeled through intermediaries, joint venture partners, subcontractors, agents or suppliers
- We conduct our procurement practices in a fair and transparent manner.
- We monitor the selection and the ethical behavior of our business partners: intermediaries, joint venture partners, subcontractors, agents, main suppliers

### 6. FAIR COMPETITION

ALBERK is committed to competing fairly and in compliance with antitrust and all other applicable laws. All ALBERK employees must strictly comply with all applicable competition or antitrust laws. When in doubt, any employee should seek advice from Technical and Administrative Department. We must encourage total transparency when drafting commercial documents and promote the strengths of ALBERK rather than highlighting the shortcomings or failings of our competitors. We shall present ALBERK in a fair and reasonable manner and ensure that information supplied is accurate and unequivocal. We must not intentionally denigrate, libel or slander our competitors when discussing with clients, nor commit ourselves to providing a service which we are unable to supply, or claim that ALBERK is accredited for a given service without checking first.

### 7. COMMUNICATION WITH THE MEDIA AND INVESTORS

We develop active communications to reinforce ALBERK image towards its customers, analysts, investors and to the public. Media relations are the responsibility of the general coordinator. All statements to the media or responses to inquiries from the media are handled through general coordinator.



# QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

## III. IMPLEMENTATION OF THE CODE OF ETHICS

### 1. ORGANIZATION RULES & PRINCIPALS

#### 1.1 IMPLEMENTATION

QA Technic shall implement a Program, based on this Program, throughout its Organization provided our mandate in the applicable arrangement empowers QA Technic to enforce the rules.

QA Technic will implement this Program by integration of its requirements into their Quality Management System and/or internal audit system – both the quality management system and the internal audit are performed by independent external auditors.

#### 1.2 QA TECHNIC BUSINESS ETHIC AND COMPLIANCE RULES AND PRINCIPALS

1.2.1 QA Technic Board has confirmed their commitment to implementing this Program by publishing their own:

- (a) Principles which will, at least, reflect the IFIA Compliance Principles
- (b) Rules which shall, at least, reflect the IFIA Compliance Rules

1.2.2 QA Technic will send a copy of the Compliance Rules which apply throughout its Organization, and any subsequent updates thereof, to the Director General of IFIA for verification of compliance with this program.

1.2.3 The IFIA Director General will, within two months of receipt of the QA Technic Compliance Rules, or any updates thereof, carry-out a documentary review and confirm to QA Technic either that it appears to comply with IFIA requirements or that it needs clarification or revision.





## QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

### 1.3 APPOINTMENT OF COMPLIANCE OFFICER AND COMMITTEE

QA Technic board of Directors are ;

Latif Murat Yılmaz	Chairman and CEO
Ayşen Yılmaz	General Coordinator

Has appointed below staff as Compliance Comitee ;

Özlem Yılmaz  
Yeşim Yüksel  
Ayşen Yılmaz  
Begüm Adakan  
Serdar Aksoy

and the following staff to ensure the execution of the program throughout QA Technic:

Özlem Yılmaz                      Quality Officer  
Yeşim Yüksel                      Compliance Officer

and the external auditors will audit QA Technic annually:

by  
Transparency International Turkey Organisation.



## QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

### 1.4 HUMAN RESOURCES

#### 1.4.1 Recruitment

Prior to job offer, prospective employees of QA Technic will be informed of QA Technic Business Ethic and Compliance Program Rules).

#### 1.4.2 Employee commitment

QA Technic shall ensure that:

(a) each employee will be provided with a copy of the QA Technic Compliance Rules and requested to sign a declaration that it has been received, read and understood. A record will be kept in the file of the Employee.

(b) The following senior managers will be requested to sign a declaration each year that they are updated and follow these program:

Yeşim Yüksel

Özlem Yılmaz

Serkan Demirsan

Sinan Köse

Serdar Aksoy

Begüm Adakan

(c) Where QA Technic mandate empowers it to enforce the rules in other parts of the Organization, managers responsible for these other parts shall be required to sign annual declarations relative to those parts of the Organization for which they are responsible

QA Technic Rules will make it clear that employees will not suffer demotion, penalty or any other adverse consequences arising from strict implementation of the Program even if it may result in a loss of business

#### 1.4.3 Training of Employee

All employees, including Managers, of QA Technic will be given a copy of the IFIA Compliance Training Guide. A Record of course completion shall be kept in the file of each Employee. Each employee to undergo compliance code training



## QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

### 1.4.4 Consultation on Code development

QA Technic employees will have the opportunity to provide input on the development of the Program during performance evaluations, staff training sessions or at review meetings or directly to the Compliance Officers.

### 1.4.5 Employee performance evaluation

QA Technic will ensure that each employee has an on-going understanding of QA Technic Compliance Program during employee performance evaluations.

### 1.5 EMPLOYEE "HELP LINES"

The Chairman of the board of Director or the General Coordinator can be contacted.

### 1.6 EXTERNAL COMMUNICATIONS

QA Technic will ensure effective external communications by:

- 1.6.1 Publicly disclosing QA Technic Rules and, if appropriate, related information on their website and in their annual accounts.
- 1.6.2 Providing facilities and tools, to receive enquiries, complaints or feedback from relevant interested parties can be sent to our main e-mail address published on the internet

### 1.7 VIOLATIONS REPORTING

- 1.7.1 QA Technic employees are encouraged to report details of violations or suspected violations to either QA Technic Compliance Officers or their nominated delegate(s).

The reporting Employee shall be fully protected against any form of reprisal unless they acted maliciously or in bad faith. If requested, the Employee's anonymity shall be protected to the extent reasonably practicable.

- 1.7.2 QA Technic employees will be required to report any solicitation for, or offer of, an improper payment or advantage coming to their knowledge in the same manner as provided for under section 1.7.1



# QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

## 1.8 MEMBER'S INVESTIGATIONS AND SANCTIONS

- 1.8.1** QA Technic Compliance Officers or their nominated delegate(s) shall initiate, where appropriate, an investigation into any violation of the Program reported to them or coming to their knowledge.
- 1.8.2** QA Technic will maintain a documented procedure for the handling of investigations and sanctions which shall include requirements for:
- (a) The maintenance of records of all reported violations and subsequent actions taken.
  - (b) The alleged perpetrator of such violation to have the right to be heard.
  - (c) QA Technic management or Compliance Committee to decide on the appropriate corrective and disciplinary measures to be implemented if a violation has been established. These measures may include a reprimand, demotion, suspension or dismissal
  - (d) The Compliance Officer to receive progress reports from his/her nominated delegates and/or the management in the locations concerned and prepare periodic summary reports for the Compliance Committee on investigations, violations established and the implementation of corrective actions and disciplinary measures.

## 1.9 EFFECTIVENESS OF THE PROGRAM IMPLEMENTATION

### 1.9.1 Management declarations

QA Technic will require its Senior Managers and where applicable for other parts of the Organization, other managers as referred to in 1.4.2.(b) above to prepare and sign, on an annual basis, a Compliance Declaration which, as a minimum, shall be based on the template contained in Annex A. These Compliance Declarations shall be received, in respect of all applicable locations and/or activities, by the Compliance Officer who shall submit an annual summary report to QA Technic Compliance Committee.

### 1.9.2 Internal audits

QA Technic will require their nominated internal auditors, as part of their internal audit plan, to verify that QA Technic Compliance Rules have been implemented within their Organization and that the Management Declarations, as per section 1.9.1, (a) have been completed in conformance with Annex A and (b) reflect compliance with the Principles and Rules and (c) in respect of those locations selected for site audits, correctly reflect the actual situation. Such site audits shall review the processes in place and include testing, on a sampling basis, to ensure the effective application and implementation of the Program. The IFIA Guidance Check List for Members' Internal Compliance Audits should be used for guidance or reference as appropriate.

The compliance findings resulting from such audits will be reported to the Compliance Officer who will submit a summary report to QA Technic Compliance Committee. The Compliance Officers and/or Compliance Committee shall take follow-up actions where appropriate.



## QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

### 1.9.3 External examinations

#### 1.9.3.1 Frequency

The effectiveness of the implementation of the Program shall be examined at least annually by the Member's appointed independent external audit firm. The required scope of the examination is detailed in section 10.3.5.

#### 1.9.3.2 Independent external audit firm

The Member's independent external audit firm appointed to carry-out this examination:-

- (a) shall be (i) either the firm engaged for the audit of the Member's (consolidated) financial statements or another external audit firm entrusted with auditing the Member's Program and, in either case, (ii) a member of a recognized national professional accountancy organization or approved by the IFIA Council as being appropriately qualified for the verification of the Member's Program, and
- (b) the external auditor shall be 100% independent from QA Technic business, i.e. not a member or associate of f. inst. ITS, BIVAC, SGS or the like.

#### 1.9.3.3 Use of complementary external audit firms

(a) If, as per section 9.3.2(b), there are countries of the Member's operation where the international audit firm does not have offices and it is necessary to use different external audit firms (which shall comply with section 9.3.2(a) ), or correspondent audit firms which do not apply a uniform approach and methods, the Member and its international external audit firm shall be required to report to the Director General of IFIA on the arrangements made to ensure that a consistent examination of the Program implementation is achieved in respect of all locations.

In such cases, the Member's international external audit firm shall act as the co-ordinator of the other external audit firms and prepare one consolidated Assurance Report.

(b) The Member's appointed external audit firm may, by agreement with the Member, utilise the services and reports of independent management system certification or accreditation bodies<sup>1</sup> which have performed audits of the Member's management systems based on international standards. However, such certification and accreditation bodies or their reports shall not be used for the verification of financial and related aspects, included in the specific Anti-Bribery requirements and section 11, without the prior approval of the IFIA Council.

#### 1.9.3.4 Notification to IFIA of Member's appointed external audit firm(s)

Prior to the appointment of the external audit firm(s), or any subsequent proposed changes thereof, the Member shall submit details to the Director General of IFIA for confirmation of compliance with IFIA requirements.



## QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

### 1.9.3.5 Scope of examination

For the purposes of demonstrating that the Member is in conformance with the IFIA Compliance Code, the Member shall require the external audit firm to:-

- (a) Perform, as a minimum, the following assurance Review Procedures based on IFIA Compliance Code:-
- (i) Verify that the Member's current Compliance Principles and Rules remain identical to those submitted to, and approved by, IFIA.
  - (ii) Verify that the Member has established a Program incorporating the requirements of the Code.
  - (iii) Observe the existence of internal management systems, processes and controls in respect of (a) alleged violations (b) Compliance Committee records and (c) compliance training.
  - (iv) Review the following consolidated management statements:-
    - Political Contributions
    - Charitable Contributions and Sponsorships
    - Intermediaries' remuneration
    - Extraordinary expenditures relating to gifts, hospitality and expenses and verify whether these statements:
      - reconcile with the accounting records and supporting documentation
      - have been approved by the Compliance Committee where applicable.
  - (v) Verify that all Management Declarations have been received and test the follow-up systems employed for ensuring that all matters of concern or reports have been addressed or acted upon by the Compliance Officer or, where applicable, his/her nominated delegate(s).
  - (vi) Any other areas and audit procedures as considered appropriate by the external audit firm and agreed with the Member.
- (b) Perform the assurance Review Procedures, as per section 10.3.5(a), by audit sampling in respect of both the Member's locations and the systems and documentation applicable to those locations. The audit sampling shall be agreed between the auditor and the Member, based upon a compliance risk assessment and taking into account the Member's Organization and peculiarities
- (c) Maximise the use of the services of the Member's Corporate Internal Audit function and/or
- (d) Internal Quality Auditors to avoid duplication of efforts and minimise additional costs.



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### 1.9.3.6 External audit firm's "Assurance Report"

- (a) The Member shall require the external audit firm to issue an Assurance Report based on the
- (b) Proforma Assurance Report, contained in Annex B, which is provided for guidance and may
- (c) be adjusted as considered appropriate by the external audit firm and/or as maybe required by professional standards.
- (d) The Member shall instruct its external audit firm to send a copy of the Assurance Report to the Director General of IFIA within 6 months of the Member's financial year-end closing date

### 1.9.3.7 Reportable Conditions

Reportable Conditions which are detected by the external audit firm during performance of the Assurance Review Procedures shall be reported in the Assurance Report regardless of whether or not the Member has already taken corrective action.

The external audit firm shall not be required to include in its Assurance Report any minor non-conformities detected. These shall be communicated separately to the Member's management for corrective action within the time frame stipulated by the auditor.

### 1.9.3.8 IFIA follow-up of Assurance Reports

- (a) The Director General of IFIA shall submit to the IFIA Council summary reports of the Assurance Reports received.
- (b) In the event that an Assurance Report contains Reportable Conditions, the Director General of IFIA shall follow these up, where applicable, in conformance with the IFIA Complaints and Disciplinary Procedures.



# QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

**ANNEX A**

**Management Declaration Template**

Confidential

.....(name of Member)'s Compliance Programme Management Declaration  
for the year ending.....20.....

To:.....(name of Member's Compliance Officer or nominated delegate)

Name of Manager:..... Job Title:.....

Locations and/or activities covered by this Declaration:.....

.....  
.....

I .....(name of Manager) do hereby declare that in implementation of  
..... (name of Member)'s Compliance Programme for the year ending  
.....20..... in each of the locations and/or activities, as listed above, falling under  
my area of responsibility

1. To the best of my knowledge I, and the members of staff reporting to me, have complied in all respects with the Compliance Programme;
2. I have verified that the Compliance Programme has been distributed to each Employee who had not previously received them;
3. I have fully and completely reported to the Compliance Officer any violation or suspected violation of the Programme, including any solicitation or offer of any improper payment or advantage, which has come to my knowledge;
4. I have fully and completely implemented all corrective and disciplinary actions required by the Compliance Committee in respect of any violation of the Programme.

Place.....

Date.....

Signature.....





# QA TECHNIC BUSINESS ETHIC AND COMPLIANCE PROGRAM (CODE OF ETHIC)

## ANNEX B

Proforma Assurance Report of external audit firm

"Assurance Report on..... (name of Member) 's Compliance Programme"

### 1. Purpose of assurance review

We have performed review procedures on the management and reporting processes of the Compliance Programme of .....(name of Member) over the year ..... or the period .... to ..... to determine whether these incorporate the requirements of the IFIA Compliance Code dated.....and whether this has been adequately implemented within .....(name of Member)'s Organisation.

.....(name of Member) is responsible for the development and maintenance of the management and internal reporting processes of the Compliance Programme. Our responsibility is to report on the management and reporting processes of the Compliance Programme based upon our review procedures.

### 2. Scope of assurance review

The scope of our review procedures is as set out in the IFIA Guidelines on Verification of Code Implementation under "Scope of examination".

The scope of the review included verifying that management declarations were received from all senior managers as identified by the Member, including listing at least one in respect of each Group Member within the Member's group membership as listed or referenced in the Members Directory on the IFIA website.

We based our review primarily on management and other information provided to us by the company's management and staff. We also interviewed personnel responsible for the Compliance Programme, including the Compliance Officer, Managers and other appropriate employees, both at Group level and selected countries. We also performed tests, on a sample basis, of relevant documentation including Group policies, management and reporting structures, documentation and systems in place at ..... (specify country(ies) visited).

There are no generally accepted international standards for these other Assurance Engagements. In the absence of such standards, we based our approach on best practices as well as on the underlying principles of the standards of the International Federation of Accountants but adapted as necessary. We, therefore, planned and performed our procedures to obtain a reasonable basis for our conclusions. However, as we have not performed an audit, we do not express an audit opinion



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### 3. Results of our assurance review

During our review the following aspects were noted for follow-up action:-

.....  
.....

Based on our review procedures, with the exception of the above mentioned findings (where applicable) nothing has come to our attention to cause us to believe that:-

- (i) the Compliance Programme does not meet the requirements of the IFIA Compliance Code
- (ii) the Compliance Programme has not been adequately enforced and implemented
- (iii) the systems for collection, analysis and aggregation of Compliance Programme violations are not functioning as designed and that
- (iv) the consolidated management statements for intermediary remuneration, political contributions, charitable contributions and sponsorships, and extraordinary expenditures relating to gifts, hospitality and expenses do not properly reflect the figures as reported by the affiliates or reporting units.

### 4. Recommendations

From our work, we have provided the following recommendations to management which have been agreed:-

.....  
.....

Name of External Audit Firm

Date