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1. PURPOSE

The purpose is to determine the principles and rules to be applied in Koç University's efforts to combat corruption and bribery

2. SCOPE

This policy covers all Koç University employees and, to the extent applicable, external stakeholders such as suppliers.

3. REFERENCES

The Turkish Penal Code, the UN Global Compact, anti-corruption legislation, Koç University Code of Ethics, and Implementation Principles

4. RESPONSIBILITIES

- 4.1 Office Of Legal Affairs is responsible for the preparation and updating of this policy.
- 4.2 The Rector is responsible for the implementation of this policy.

5. DEFINITIONS

5.1 Donation

It refers to cash or in-kind transfers made without any consideration or expectation in return.

5.2 UN Global Compact

It refers to the treaty based on United Nations declarations universally accepted, covering 10 core areas of responsibility under the main headings of human rights, labor standards, environment, and anti-corruption (<https://www.globalcompactturkiye.org/10-principles>), addressing social responsibility and sustainability practices.

5.3 Government/Public Official

In the context of this policy and without being limited to a specific number;

- i. Academicians,
- ii. Some administrative staff,
- iii. Employees working in any public institution or public economic enterprise in a local or foreign country,
- iv. Employees of any political party located in a local or foreign country, all political candidates,

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- v. Individuals holding administrative or judicial positions in any legislative body in a local or foreign country,
- vi. Judges, jury members, or other judicial officials serving in international or supranational courts or foreign state courts,
- vii. Officials or representatives working in national, international, or supranational parliaments,
- viii. In the arbitration proceedings resorted to for the resolution of a legal dispute, the arbitrators can be either citizens or foreigners,

5.4. Business Partners

It includes suppliers, working and project partners, representatives, agents, subcontractors, and consultants acting on behalf of the university

5.5. Facilitation Payments

Facilitation payments are inappropriate payments made without any legal basis to secure or expedite a process that the applicant already has the right to.

5.6. BRIBERY

Bribery means, in a commercial transaction or any relationship, offering, promising, or giving something of value to a public official or any third party in order to obtain an improper advantage, either to make them perform or refrain from performing a duty related to their position, or to influence them to engage in corruption. In other words, bribery is a way of encouraging corruption by providing benefits or incentives to the other party with the aim of obtaining illicit gains or favors.

- Qualities that partially or completely affect or may affect impartiality, performance, and decision-making ability,
- May cause reputational risk if it becomes known to the public,
- May lead to the annulment of the existing legislation,
- May create the perception of bribery being committed or,
- It is any action that leads to preferential treatment for performing a specific task,

5.7. Politically Exposed Persons

Includes individuals who currently or previously held significant public positions, high-level politicians, officials serving in administrative and judicial bodies and/or armed forces, senior officials working in public economic enterprises, individuals holding important positions in political parties, managers working in international organizations and institutions, as well as individuals in positions equivalent to those mentioned in this definition, and all persons closely related to these individuals, including their family members.

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5.8. Sponsorship

Sponsorship is the support, in cash or in-kind, of artistic, social, sports, or cultural events, deemed beneficial to participate in under sponsorship agreements or other types of contracts containing sponsorship conditions, with the aim of gaining corporate benefits.

5.9. Improper Benefit

It is the benefit obtained by one party in an improper manner, by violating their own duties and responsibilities, in order to provide an advantage to the affiliated party.

5.10. Corruption

Corruption is the abuse of one's powers to gain personal benefits, either for oneself or for a third party.

5.11. Incitement to Corruption

It means encouraging the other party in an improper manner to use their position and authority in violation of the regulations.

6.CORE PRINCIPLES

6.1. Koç University adopts conducting all its activities in accordance with the highest ethical standards as a fundamental principle. In this context, the University embraces all the principles listed in the UN Global Compact, including the principle of "zero tolerance for all forms of corruption," and acts in compliance with them.

6.2. No employee can, directly or indirectly, provide or receive any form of bribery, obtain improper benefits, incite corruption, or grant authority to individuals in relation to these matters through a Business Partner or any third party.

6.3. Third-Party Due Diligence

Efforts will be made to conduct Third-Party Due Diligence for Business Partners to prevent corruption or identify Politically Exposed Persons. After the implementation of this policy, conducting Third-Party Due Diligence for Business Partners is essential. The scope of Third-Party Due Diligence can be expanded to include controls and identification of matters stated in the Economic Sanctions and Export Controls Policy.

6.4. Gifts and Hospitality

All received, given, or offered gifts and hospitality must comply with the following criteria:

- i. In compliance with anti-bribery and anti-corruption legislation,
- ii. Non-cash or non-cash equivalent, except for incentives related to sporting achievements or incentives for ethical scientific research,

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- iii. Suitable for the position of the recipient of the gift or hospitality and proportionate to the circumstances,
- iv. Recorded accurately and transparently in accounting records,
- v. Should not be of a nature that could create an impression of being given with the intention of inappropriately influencing the recipient due to the frequency of previously given/received gifts, leading to a perception of causing corruption.

6.5. Sponsorships and Donations

Providing or encouraging corruption through grants, donations, or sponsorships in exchange for any improper benefit to a Public Official or Politically Exposed Person is prohibited. Making donations or any form of in-kind or cash contribution to any political party on behalf of Koç University is strictly forbidden.

6.6. Facilitation Payments

It is prohibited for employees to make or accept facilitation payments on behalf of Koç University.

6.7. Employment of Politically Exposed Persons and Business Relationships with These Individuals

Subject to compliance with the following criteria and approval by the Rector, Politically Exposed Persons may be hired or a business relationship may be established with these individuals:

- i. The relevant transaction or employment should serve an existing legitimate purpose of the University,
- ii. The employment of the individual should not create an impression of being hired in exchange for obtaining an improper benefit or for the performance of an action contrary to the regulations,
- iii. The person to be employed should objectively possess the qualifications required for the relevant position,
- iv. The salary and other benefits should be determined appropriately based on the job and the qualifications of the individual.

7.REVIEW

The responsibility for reviewing and updating this policy lies with the Legal Counsel. The review is conducted annually in July.

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8. CHANGE / DISTRIBUTION / APPROVAL TABLE

Amended Page	Date	Amendment	Made by

Distribution (Related Departments)
All Units Koç University

Conformity Approval (Chief Legal Counsel)	Enforcement Approval:(President)
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