



**KOÇ
UNIVERSITY**



**CODE OF ETHICAL CONDUCT AND
PRACTICE PRINCIPLES**



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1. PURPOSE

The purpose of this document is to bring a common ethical understanding to the daily working life of the University by creating a working culture and to determine the practice principles.

2. SCOPE

These principles apply to all full-time and part-time academic and administrative staff of Koç University.

3. REFERENCES

- 3.1. The Regulations of Higher Education
- 3.2. The Core International Human Rights Treaties
- 3.3. The United Nations Global Compact
- 3.4. Koç University Administrative Staff Personnel Regulations
- 3.5. Sexual Harrassment Prevention Regulation

4. BASIC PRINCIPLES

Koç University aims to raise individuals securing added value and bearing responsibility for the world and their country with a people-oriented approach, and to produce science. To that end, it aims to be a reliability, continuity and prestige symbol for its students, graduates, employees, suppliers, non-governmental organizations –shortly all stakeholders– both nationally and globally.

Koç University Code of Ethical Conduct is prepared in line with the principles of Vehbi Koç, the founder of Vehbi Koç Foundation, to be the best, to create wealth for continuous development, to strengthen the country, to see human resource as the most important asset and to adopt superior business ethics and honesty.

While this document is intended to be guidance, it is expected from the University staff to demonstrate attitudes and behaviours securing the cultural integrity of the University. Additionally, it is expected from all employees to protect and improve the reputation and reliability of the name of “Koç University”

All employees of the Koç University are obliged to respect the Koç University Code of Ethical Conduct. It is expected from all stakeholders to respect business ethics rules and all of the practice principles supporting these rules everywhere. As well as the obligation to respect these rules, all employees and stakeholders are also obliged to notify the relevant authorities when they are aware of any disrespect to these rules.

It is among the fundamental duties and responsibilities of the mid and senior-level managers of Koç University to inform all employees about the Code of Ethical Conduct, to ensure that the employees would give due consideration to these rules, and to make sufficient effort and to show leadership for the realization of the Ethical Code of Conduct.

4.1. University/Employee Relations

Koç University aims to be the most preferred, honourable university for any related person and stakeholder, composed of the most successful and efficient academic members and professionals adding value to sustainable growth.

Koç University esteems its employees and respects employee rights.

The policy of *“Our most important asset is our people”* is one of the fundamental principles adopted by Koç University since it was founded and expresses the people-oriented approach of the University.

In this regard, Koç University adopts the following principles on its relations with academic and administrative staff:

- For employment, to seek only appropriate qualifications as eligibility criterion, to provide equal opportunities without discrimination,
- For the advancement of the University, to bring the most qualified young people, experienced academic staff and professionals to the University,
- To get maximum benefit from the qualifications, powers and creativity of the staff,
- To provide equal facilities and opportunities for the training, instruction and advancement of the staff,
- To award effort and success with fair and competitive wage policies, efficient and objective performance evaluation system and practices,
- To increase attachment and commitment of the staff to the University by providing equal opportunities in promotion and rewarding,
- To enable continuity of labour peace,
- To provide clean, healthy and secure working conditions to staff,
- To create and maintain a transparent working environment considering cooperation and solidarity as the utmost component and promoting mutual respect,
- In order to protect human dignity in workplace, to strictly prevent any employees of the University from being subjected to any kind of violence or harassment,
- To prevent any potential incidents and situations related with the harassment in accordance with the framework of Sexual Harassment Prevention Regulation,
- To take into account the view and suggestions of the staff, to respond them and to take motivation increasing measures,
- Not to share the private data of the staff, other than legally obliged, without the permission and knowledge of the staff,
- To respect human rights,
- To carry out the scientific works within the framework of liberty principle, to make no compromise of freedom and accuracy.

4.2. University/Stakeholders Relations

The fundamental principles guiding the relations of Koç University with its stakeholders are listed as follows:

- To represent and raise the prestige of “Koç University” in the eye of public,
- To benefit from the comments and suggestions and to maintain positive relationships by keeping the communication channels with the stakeholders open,
- To avoid personal comments while speaking for the University in front of public,
- As a university, to have a sense of responsibility about social issues.

a- Relations with the State

- To comply with all applicable legal norms in the countries operated and to be operated,
- To manage, record, maintain and report all operating and financial activities in full accordance with law.

b- Social Responsibility

- To design, support and carry out studies contributing to scientific, economical, social and cultural development,
- To show awareness to social matters and to support society in its advancement.

c- Relations with Students

- To create value for students, to meet their demand and requests at the highest level in parallel with the education policies and philosophy of the University,
- To raise awareness among students of the ethical values of the University and ensure that they respect those values,
- To provide high-quality education services and follow consistent education policies,
- To create a long-term environment of trust in the relations with students,
- To aim to be the first preference of the students by enhancing student satisfaction,
- Not to misinform or mislead students,
- To enable the contribution of students into the decision-making processes of the administration about themselves,
- To observe equal opportunities among students,
- To ensure students act consciously, aware of their rights and obligations,
- To ensure students comply with all required norms by exercising self-control.

d- Relations with Suppliers

- To create mutual value in the business relations with suppliers,



- To maintain an open, direct and accurate communication with suppliers,
- To select suppliers with objective criteria,
- To respect reasonable confidentiality and work safety rules required by supplier in supplier auditing and visits,
- To maintain the ethical values of the University within and during the relations with suppliers.

e- Relations with Competing Parties and Competition

- Apart from the limitations permitted by the legislation, not to make any agreements or not to act in any way, directly or indirectly, aiming to prevent, distort or restrict competition, or having or that may have such an effect,
- Not to have any discussions or information exchanges with competing parties about market and/or competition conditions,
- To avoid any discussions and actions at the meetings of association, assembly, chamber, professional body etc. participated on behalf of the University and at the other private or professional meetings and talks that may lead to or may be described as situations mentioned above.

f- Global Responsibility - Environment Protection

- To improve and enable efficient implementation of environment policies of the Koç University.

g- Global Compact

- To act for the benefit of our country and earth in accordance with the principles in the areas of human rights, labour, the environment and anti-corruption set by the United Nations Global Compact and to show exemplary corporate citizenship through our staff and suppliers.

4.3. The Code of Ethical Conduct

It is the primary responsibility for our academic and administrative staff to maintain and advance the association of the name of "Koç University" with professionalism, honesty and trust. In this regard, it is expected from the staff of Koç University:

- To respect legal norms at all times,
- To perform their duties pursuant to the fundamental moral and humane values,
- To avoid any attitude and behavior harmful to human dignity, including mobbing and sexual harassment, in the workplace,
- To act in justice, good faith and sympathy with the aim of mutual benefit in all relations,
- For whatever the purpose may be, not to obtain unfair profit and benefit, accept or offer bribe from/to the real and legal persons under any circumstances,

- In the performance of duties, to act in compliance with the relevant business code of conduct and any practice principles supporting those rules,
- Unless openly authorized, not to behave, state or correspond in such a way bringing the University under an obligation,
- Not to act in a disturbing and/or harmful manner to other employees and not to disharmonize the work environment,
- Including the data and information systems of the University, to take care of all tangible and intangible assets as if their own personal assets and to protect them against any potential loss, damage, misuse and unethical use, abuse, theft and sabotage,
- To use the sources of the University only for the works related with the University,
- To work with an awareness that the University would be ethical precedent for the students and to act in line with this responsibility.

a- Asset and Knowledge Management

Intellectual Property Rights

- To ensure that the legal processes are started and completed in time in order to safeguard the intellectual property rights of the newly developed products, mechanisms and software,
- To avoid any –deliberately– unauthorized usage of patents, copyrights, trade secrets, brand, computer programs or other intellectual and industrial property rights of other corporations.

Knowledge Management

- To ensure all legally required records are kept appropriately and in accordance with data security,
- Not to respond to third party requests of information falling within the category of “confidential to University” without the approval of senior management,
- To exercise due diligence for the accuracy of the statements announced and records provided by the University.

b- Security and Crisis Management

- To take necessary measures to protect the staff, data and information systems and fields of activity of the University against any potential terror act, natural disasters and malevolent attempts,
- To prepare the required crisis planning for emergency crisis management to be formed in case of terror, natural disaster, etc. and, through this method, to maintain the continuity with minimum loss in the case of crisis,
- To take all kinds of measures in order to prevent the University assets to be stolen or damaged.

c- Confidentiality

- To act with an awareness that the financial and business secrets of Koç University, the information that might impair the competition power of Koç University, the rights and data belonging to the staff and the agreements with business partners fall within the scope of “confidentiality” and to maintain their protection and confidentiality,
- For whatever the purpose may be, not to share the knowledge learned and documents obtained as part of the job with unauthorized persons and departments both within and out of the University and not to use for speculative (directly or indirectly) purposes,
- Not to use non-public information about students, graduates and other real and legal person business partners for purposes other than anticipated or share them with third parties without necessary permissions.

d- Avoiding Conflict of Interest

Conflict of interest; means to possess any kind of actual or potential benefit or any financial or other kind of actual or potential personal interest that affects or may affect the duties of the staff to be performed impartially and without expecting any personal benefit and that is provided or may be provided to the staff, their relatives, friends or associated real or legal persons.

e- Self-Dealing Prohibition

- Not to gain unfair advantage on behalf of one’s own, relatives or third parties by misusing his/her status and authorities,
- In personal investments, to exercise due care for avoiding conflict interest with Koç University,
- To exercise due care for the personal investments or engagements other than normal duty activities not to hinder the time and diligence allocated to their current duties at Koç University and to avoid any such circumstances that may prevent to focus on main duties,
- To notify the higher manager in case an employee and any person that fills the principal decision making position in regard with the relevant work at the customer or supplier entities are immediate relatives,
- The employees should notify the University at the start of their employment if they are shareholders in a company or participate in the investments made by that company. This matter shall be particularly inquired during the job interview.
- The employees shall notify the next higher manager of any changes in this regard and other matters that may be perceived as similar conflicts of interest and this notification shall be forwarded to at least two upper managers.
- To inform the higher manager as soon as he/she learned that his relatives are shareholders or financial interest holders in a company having a business relationship with the University.

f- Participation to Representation and Organization Invitations

Apart from conferences, receptions, promotional activities, seminars etc. open to general participation and organized by real or legal persons that has developed or carrying a potential to develop business relation with the University; participation to invitations such as sport activities, trips in Turkey/abroad etc. that may affect or be perceived as affecting the decision making processes are subject to approval of the authorized department managers.

g- Receiving and Giving Gifts

While maintaining relations with private or official real and legal persons who would like to develop or continue a business relation with the University;

- Apart from the materials given as customs of trade, in accordance with commercial customs or commemorative/promotional items, not to accept and offer any gift that creates an impression of illegality, may produce a dependency relation or may be perceived so.
- Not to request any discount or advantage from suppliers, students, Koç Group companies or third parties that is ethically inappropriate and/or may cause conflict of interest, not to make such an offer to third parties and not to accept such an offer.

h- How to Do Business with the University for the Resigned

In case of doing business with the University after resignation, it is required to act in parallel with the interests of the University, to observe business moral and ethical rules, to avoid pre and post conflicts of interest.

i- Insider Trading

To be aware that trying to gain a commercial interest by using any kind of confidential information of the University or giving to third parties (insider trading) is considered as a legal crime and never make any attempt in this regard.

j- Occupational Health and Safety

- The University aims to fully secure occupational health and safety both at the fields of activity and during work. The staff shall comply with the rules brought in this regard and take the necessary measures.
- No goods or materials posing a danger for the staff and the University or carrying an illegality shall be kept at the fields of activity of the University.
- Except the ones based on an appropriate medical report, the staff shall not kept any narcotic, addictive, restrictive or destroying substances on mental or physical faculties at office and shall not work at office or within the scope of job under the effect of such substances.



k- Prohibited Political Activity

The University does not grant to political parties, politicians or political candidates. No demonstration, propaganda or similar activity is permitted within the boundaries of the University area for this purpose. The resources of the University (such as vehicle, computer, e-mail) cannot be allocated to political activities.

5. METHOD

5.1. Obligation to Notify of Violations

Staff is obliged to notify the manager or, as the case may be, the next higher manager and/or the President, of any actual or suspected violation against Koç University Code of Ethical Conduct or legal regulations applied to the University.

These notifications of the staff shall be strictly kept secret from third parties.

It should be minded that this notification mechanism shall be in line with the interests of the University.

It is especially important to have the notifiers freed from intentions such as gossiping about the notified or affecting his/her career in a negative way. In this respect, confidentiality, objectivity and compliance with the ethical rules are extremely critical in the course of notification and investigation. Both the notifier and the authorities managing this process must exercise maximum care and attention to this point.

If a violation is at the same time considered as a crime, the University shall fulfil its lawful obligations.

Any confirmation of lies and/or aspersions shall be interpreted as an ethical code violation and necessary sanctions shall be imposed.

5.2. Disciplinary Practice

The disciplinary penalties to be imposed upon a violation of the Code of Ethical Conduct are as follows:

- If a deliberate misconduct is in question, to dismiss (pursuant to the applicable articles of the Labour Law) and, if necessary or legally obliged, legal remedies shall be followed. The past beneficial works of the offender cannot cause a full or partial remission of the judgment.
- If there is no abuse or a negligence committed indeliberately and caused by oversight or negligence is in question, other than cases of obvious contradiction with law, appropriate oral or written admonition shall be given in accordance with the effect and extent of the act.

NOTES

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