

 <b>ABDULLAH GÜL</b> ÜNİVERSİTESİ	<b>Corruption and Bribery Policy</b>	<b>Document No:</b>	POL-11
		<b>Publishing Date:</b>	15.10.2017
		<b>Revision Date:</b>	15.09.2023
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## 1. Purpose

Abdullah Gül University (AGU) is firmly committed to ethical conduct and integrity in all aspects of its operations. This Corruption and Bribery Policy is designed to prevent, detect, and address any acts of bribery or corruption within AGU, ensuring that the university maintains a culture of transparency, accountability, and compliance with national and international regulations.

## 2. Scope

This policy applies to all individuals associated with AGU, including academic and administrative staff, students, vendors, visitors, and any other third parties or organizations conducting activities on behalf of the university. It is applicable to all AGU operations, whether academic, research, administrative, or commercial, and extends to actions taken both within Turkey and internationally.

## 3. Policy Statement

AGU strictly prohibits and condemns all forms of corruption and bribery, and adheres to the Republic of Turkey's Anti-Bribery and Anti-Corruption laws. AGU is dedicated to preventing any behavior that may be construed as bribery or corruption and upholds the following principles:

- **Zero Tolerance:** AGU has a zero-tolerance approach to bribery and corruption. All members of AGU and affiliated parties must comply with both national legislation and AGU's own Anti-Corruption policy, refraining from offering, promising, giving, or accepting any form of bribe.
- **Ethical Conduct:** Staff, students, and third-party associates must act ethically, ensuring that decisions are based on merit and integrity, free from undue influence.
- **Accountability and Transparency:** AGU promotes accountability and transparency by regularly monitoring and reviewing practices to detect and prevent corrupt activities. All individuals are encouraged to report suspicious behavior, with a strict no-retaliation policy for whistleblowers.

## 4. Prohibited Practices

- **Offering or Receiving Bribes:** No individual affiliated with AGU shall offer, promise, give, request, or receive any financial or other advantage intended to influence the performance of a function or activity.
- **Facilitation Payments:** AGU prohibits facilitation payments, which are unofficial payments made to secure or expedite routine actions by officials. All transactions must comply with formal processes and legal standards.
- **Conflict of Interest:** Any conflict of interest that may compromise decision-making must be disclosed to ensure that personal gain does not influence official duties.

## 5. Reporting and Accountability Mechanisms

AGU is committed to a transparent reporting system that ensures adherence to anti-bribery and anti-corruption standards:

- **Reporting Channels:** AGU provides secure and confidential reporting channels for employees, students, and third parties to report any potential bribery or corruption concerns.
- **Protection for Whistleblowers:** AGU strictly enforces a no-retaliation policy for individuals who report suspected breaches in good faith.

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- **Regular Audits and Reviews:** To ensure compliance, AGU conducts regular audits and reviews of its processes, particularly those related to financial and procurement activities. These audits support AGU's commitment to transparency and help identify potential areas for improvement.

## 6. Training and Awareness

AGU is dedicated to educating its community on recognizing and preventing corruption:

- **Employee Training:** All AGU employees receive regular training on anti-corruption practices, reporting mechanisms, and the consequences of non-compliance.
- **Student Awareness Programs:** AGU incorporates anti-corruption awareness into its orientation programs for students, promoting ethical conduct and integrity.

## 7. Disciplinary Actions

Any breach of this policy is considered a serious offense and will lead to disciplinary actions, which may include suspension, termination, or legal action, depending on the severity of the violation.

## 8. Continuous Improvement

AGU recognizes the importance of continuously improving its anti-corruption practices. This policy will be periodically reviewed to reflect updates in Turkish law, global anti-bribery standards, and best practices, ensuring AGU's commitment to ethical conduct remains steadfast.