GIFTS, MEALS, ENTERTAINMENT AND OTHER BUSINESS COURTESIES

BİLGİ employees may exchange gifts, meals, entertainment, and other business courtesies with suppliers only if they are reasonable, infrequent, and modest in amount, as well as consistent with local law, custom, and practice. In some instances, BİLGİ employees may be subject to monetary limitations on the value of such business courtesies that may be given or received. In all cases, BİLGİ employees must never offer or accept such courtesies under circumstances where they could affect, or appear to affect, decision making. In addition, they must never give or receive cash. Suppliers are expected to respect these restrictions.

CONFLICTS OF INTEREST

BİLGİ employees should act in the best interest of BİLGİ when conducting BİLGİ business. They should have no relationship, financial or otherwise, with any supplier that might conflict, or appear to be in conflict, with their obligation to act in the best interest of BİLGİ. Suppliers should have no financial relationship with any BİLGİ employee with whom the supplier may interact as part of their engagement with BİLGİ. Suppliers should take care that any personal relationship with a BİLGİ employee is not used to influence the BİLGİ employee’s business judgment. If a supplier has a family or other relationship with a BİLGİ employee that might represent a conflict of interest, the supplier should disclose this fact to BİLGİ or ensure that the BİLGİ employee does so.

SPEAKING UP

Suppliers who believe that a BİLGİ employee, or anyone acting on behalf of BİLGİ, has engaged in illegal or improper conduct, should report the matter to BİLGİ. Suppliers should at once notify BİLGİ Secretariat General regarding the matter. Supplier’s relationship with BİLGİ shall not be affected by an honest report of potential misconduct.

Accepted by Board of Trustees resolution, dated December 28, 2012, no. 906. www.bilgi.edu.tr | 444 0 428
CODE OF CONDUCT AND ETHICS FOR SUPPLIERS

İstanbul BİLGİ University (BİLGİ) is committed to acting honestly and ethically and expects the same of our suppliers. The BİLGİ Code of Conduct and Ethics establishes principles of appropriate behavior and ethical conduct for BİLGİ employees. This Code of Conduct and Ethics for Suppliers sets similar standards for our suppliers.

RECORDS AND REPORTING

Suppliers must keep accurate records of all matters related to their business with BİLGİ, including the proper recording of all expenses and payments. If BİLGİ is being charged for a supplier employee’s time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the changing of an expense to a different accounting period.

ASSETS AND INFORMATION

Suppliers should protect BİLGİ’s assets and information. Suppliers, who have been given access to BİLGİ’s assets, whether tangible or intangible, should use them only within the scope of the permission granted by BİLGİ and for the purposes of engagement with BİLGİ. Suppliers who have been given access to BİLGİ’s confidential information should not share it with anyone unless authorized to do so by BİLGİ. If a supplier believes it has been given access to BİLGİ’s confidential information in error, the supplier should immediately notify its contact at BİLGİ and refrain from its further distribution.

If the supplier is under a contractual or legal obligation not to share the information related to any other person or organization, he should not share it with anyone at BİLGİ.

BRIBERY AND CORRUPTION

BİLGİ has a zero tolerance policy for making or accepting bribes or kickbacks. Suppliers, in connection with any transaction as a supplier to BİLGİ, or that otherwise involves BİLGİ, must not transfer anything of value, directly or indirectly, to anyone, including government officials, employees of government-controlled entities, or employees of BİLGİ or any other organization, in order to obtain any improper benefit or advantage. Suppliers acting on behalf of BİLGİ must comply with all applicable local laws dealing with bribery.