İSTANBUL BİLGİ ÜNİVERSİTESİ
GIFTS, MEALS, ENTERTAINMENT,
SPONSORED TRAVEL
and
OTHER BUSINESS COURTESIES
INTRODUCTION

These Guidelines apply to every officer, director, full- and part-time employee, faculty member, contractor, and student worker of BİLGİ. They also apply to all agents, representatives, consultants, distributors, dealers, and other third parties doing business on behalf of BİLGİ or its affiliates. Questions about these Guidelines should be addressed to the relevant Local Compliance Officer or through the BİLGİ Ethics Helpline.

I. Basic Guidance

These Guidelines address the provision and receipt of common courtesies, meals, gifts, entertainment, travel and travel-related expenses, and expenses associated with events such as conferences, seminars, college fairs, and training (collectively, “business courtesies”). Each of these can be a legitimate and valuable practice, but they also can create risks of improper appearance or even violation of laws against bribery and corruption.

Accordingly, we must never offer or receive courtesies under circumstances where they could affect, or appear to affect, decision making. Business courtesies given to or received from suppliers, students, and others outside BİLGİ must be related to a legitimate purpose and given or received without expectation of any favorable decision or unfair advantage.

Consistent with the BİLGİ Code of Conduct and Ethics, BİLGİ personnel may provide or receive business courtesies as long as they are:

• related to a legitimate purpose, such as the promotion, demonstration or explanation of products and services;

• provided without expectation of any favorable decision, official action or unfair advantage;

• reasonable, infrequent, and modest in amount;

• not paid in cash or cash equivalents;
• appropriate in character and consistent with local business customs and practices;
• documented with receipts and properly accounted for in our books and records;
• authorized as required by relevant policies and procedures; and
• consistent with applicable laws.

Documentation and Approval

All business courtesy expenses must be properly documented to reflect:

a. the purpose of the gift or other courtesy,
b. the individual receiving it,
c. the recipient’s organization and position,
d. a description of the business courtesy,
e. the identity of others attending (if a meal or other event), and
f. the amount.

All such expenses must be approved by the manager of the person providing the courtesy. If multiple BİLGİ personnel attend an event, the most senior person should pay, and approval should come from that person’s manager.

Note on business courtesies for government officials

Although these Guidelines apply to the provision of business courtesies to anyone outside BİLGİ, BİLGİ personnel must exercise particular caution in the payment, reimbursement, or provision of business courtesies to government officials, as they are often subject to more restrictive legal requirements. Any such expenses paid directly or reimbursed must be genuine, reasonable, directly related to a legitimate business activity of BİLGİ, and allowed by Turkish law. Government officials in Turkey are not allowed to accept any gifts or other business courtesies, and these should not be provided unless it has been affirmatively determined that it will not violate any law.

The Basic Guidance set out above applies to all business courtesies. Additional approval requirements, monetary limits, and guidance are set out below for specific cases.
II. Approval Requirements

In addition to the Basic Guidance above, the following approval requirements apply to the payment, reimbursement, provision, or receipt of business courtesies.

A. Gifts and Promotional Items:

BİLGİ personnel may provide promotional items bearing a BİLGİ or institutional logo, or other modest gifts, worth up to US$75 to an individual once in a calendar year without prior approval, so long as such items are provided consistent with the Basic Guidance set out above. The payment, reimbursement, or provision of all other gifts and promotional items requires the advance approval of the relevant Local Compliance Officer.

BİLGİ personnel may accept gifts worth up to US$75 (total, from all sources) in a calendar year, so long as such items are provided consistent with the Basic Guidance set out above. The acceptance of all other gifts and promotional items from outside parties requires the approval of the relevant Local Compliance Officer.

If there are applicable local Guidelines that set out different value amounts, personnel should follow those.

B. Meals and Entertainment:

BİLGİ personnel may provide modest meals and entertainment, such as lunches, dinners, or tickets to sporting events, not exceeding a total value of US$100 per person, as long as meals and entertainment to any one individual does not exceed US$400 in a calendar year, and the provision of the meals and entertainment is consistent with the Basic Guidance set out above. The payment, reimbursement, or provision of all other meals and entertainment requires the advance approval of the relevant Local Compliance Officer.

BİLGİ personnel may accept modest meals and entertainment, such as lunches, dinners, or tickets to sporting events, not exceeding at total value of US $100 per event, and not exceeding US$400 (total, from all sources) in a calendar year, and the acceptance of the meals and entertainment is consistent with the Basic Guidance set out above. The acceptance of all other meals and entertainment from outside parties requires the approval of the relevant Local Compliance Officer.

If there are applicable local Guidelines that set out different value amounts, personnel should follow those.
C. Meals and Other Courtesies Related to Sponsored Events:

“Sponsored Events” means BİLGİ-sponsored seminars, curriculum-development conferences or other organized meetings to further BİLGİ interests or the development educational opportunities in an institution, country or region. Such events may be held to promote BİLGİ’s goals, to further educational goals in a country or region and/or to build goodwill for BİLGİ.

The primary purpose of the Sponsored Event must be consistent with BİLGİ’s goals or the development of educational prospects, and not undertaken for entertainment purposes, to confer any personal benefit, or as a reward or inducement for doing business with BİLGİ or attending a BİLGİ institution. It is permissible if the purpose includes the highlighting of BİLGİ’s approach to education, though not to specifically induce participants to do business with BİLGİ in exchange for lavish or excessive gifts, meals, or entertainment.

The Guideline value amounts and approval requirements for the provision of gifts, meals, and entertainment at Sponsored Events are the same as those set out in sections II.A. and II.B., above.

D. Travel and Travel-Related Expenses:

As part of a Sponsored Event or other meeting or demonstration of products and services, we may, under appropriate circumstances, provide airfare, other forms of transportation, or accommodations to outside parties. All such expenses require the advanced approval of the relevant Local Compliance Officer. All travel and travel-related expenses must be provided consistent with the Basic Guidance set out above, as well as the following additional requirements.

• The travel must be for a legitimate purpose, such as meetings to tour a BİLGİ university or to observe or discuss BİLGİ programs;

• The expenses must be related entirely to the legitimate purpose (e.g., family members of the individual receiving legitimate travel reimbursement may not travel at BİLGİ expense) and must not include any lavish or excessive entertainment such as side-trips, unnecessary stopovers, or other activities unrelated to the legitimate purpose of the travel (unless paid for entirely by the individual in question);

• Travel expenses may only be reimbursed against appropriate receipts or equivalent documentation;
• Payments should be made directly to the hotel, airline, or service provider whenever possible. If an individual or government official personally pays expenses that BİLGİ agreed to cover, that person should fill out an expense report and supply it to his or her employer, after which BİLGİ may reimburse the employer.

Not: This advanced approval requirement does not apply to travel payments related to:

• vendors whose travel expenses are to be reimbursed pursuant to a contract that has been approved according to ordinary contract approval processes
• academic speakers invited to teach or speak on campus
• job candidate travel for interviews

BİLGİ Personnel may not accept travel and travel-related expenses from outside parties without approval from the relevant Local Compliance Officer. This advanced approval requirement does not apply to travel payments received by faculty members invited to speak at other institutions.

III. Handling Requests for Payment and Offers of Business Courtesies

If any person requests a direct or indirect payment of anything of value that these Guidelines do not specifically authorize, BİLGİ personnel must politely, but firmly, decline. BİLGİ Personnel must ensure that all joint venture partners or third parties acting on behalf of the Company also refuse to make such payments. BİLGİ personnel receiving a request for an improper payment should report the matter promptly to the relevant Local Compliance Officer or through the BİLGİ Ethics Helpline. BİLGİ personnel who receive offers of gifts or other business courtesies that exceed these Guidelines should politely decline and explain the BİLGİ Guidelines. If returning a gift would offend the giver, or the circumstances preclude its return, BİLGİ personnel may accept the gift, but should notify the relevant Local Compliance Officer. The Local Compliance Officer can arrange to donate the item to charity, or to distribute or raffle the item among a large group of personnel.