



DIRECTIVE ON COMBATING CORRUPTION, BRIBERY, AND ORGANIZED CRIME

SECTION ONE

Purpose, Scope, Legal Basis, and Definitions

1. Short Title

“Arkin University of Creative Arts and Design (ARUCAD) Ethics and Anti-Corruption Directive.”

2. Definitions

For the purposes of this Directive, the following terms shall mean;

- a) University: Arkin University of Creative Arts and Design (ARUCAD),
- b) Rector: The Rector of ARUCAD,
- c) Unit: The relevant Faculty, Institute, School, or Vocational School of the University,
- d) Corruption: The abuse of a duty or authority for personal gain, or the misuse of private authority or power for benefit purposes within the context of business relations,
- e) Bribery: The offering, promising, giving, requesting, or accepting of any benefit for the purpose of inducing an unlawful act, an unethical act, a breach of trust, or the improper performance of a contractual obligation,
- f) Organized Crime: The planning, coordination, and execution of unlawful activities by more than one person within a hierarchical structure or an organization characterized by continuity, for the purpose of obtaining material gain.

3. Purpose

The purpose of this Directive is to prevent all forms of corruption, bribery, and organized crime activities within ARUCAD, and to develop and sustain a transparent, fair, and accountable governance approach.

4. Scope

This Directive covers all academic and administrative staff of ARUCAD, its students, all stakeholders of the University, and its business partners.

SECTION TWO

Principles

5. Zero Tolerance Policy

All academic and administrative staff of the University, as well as its students, are obliged to carry out their duties and activities within the framework of the principle of integrity and without obtaining any unfair advantage through corruption or bribery in any manner whatsoever. Acts of bribery and corruption constitute criminal offenses and, in addition to subjecting the University and its members to legal and criminal liability, also damage the institutional reputation of the University. The University

adopts a zero-tolerance policy against such acts. Any violation of this policy shall be subject to severe disciplinary sanctions.

6. Transparency and Accountability

The University adopts the principles of transparency and accountability in all of its activities. Within this scope:

- (1)** All academic, administrative, and financial decisions and transactions are conducted in an open and accessible manner.
- (2)** The use of financial resources, as well as procurement and tender processes, are regularly reported and subject to audit.
- (3)** Conflicts of interest are taken into consideration in decision-making processes.
- (4)** University management and staff are obliged to disclose the outcomes of their activities and to assume responsibility arising therefrom.
- (5)** University–community collaborations, projects, and social responsibility activities are shared with the public in a transparent manner.
- (6)** In the event of a violation of the principles of transparency and accountability, disciplinary provisions shall be applied.
- (7)** University management is obliged to explain the grounds for its decisions and to assume responsibility for their consequences.
- (8)** Academic and administrative staff act in accordance with ethical principles, legislation, and university policies while performing their duties.
- (9)** Students are responsible for complying with the principles of academic integrity and discipline.
- (10)** The University bears an obligation to account for and disclose the outcomes of its activities to all stakeholders.

7. Legal and Ethical Compliance

(1) Legal Compliance;

- (a)** All academic, administrative, financial, and social activities of the University are conducted in accordance with the applicable national legislation, international conventions, and higher education standards.
- (b)** No transaction, activity, or cooperation that is contrary to the law may be undertaken.

(2) Ethical Compliance

- (a)** Compliance is not limited to legal requirements alone; adherence is also maintained to the principles of academic integrity, human rights, equal opportunity, diversity, environmental sustainability, and institutional social responsibility.
- (b)** Academic staff, administrative staff, and students are obliged to act within the framework of the principles of scientific integrity, impartiality, avoidance of conflicts of interest, and respect.

(3) Responsibility Toward Stakeholders;

- (a)** The University acts in compliance with legal and ethical standards not only in its internal operations but also in its relations with students, alumni, public authorities, the business community, civil society, and society at large.

8. Education and Awareness

- (1)** The University conducts regular training and awareness-raising activities to ensure that all academic and administrative staff and students are informed about ethical principles, transparency, accountability, and the fight against corruption and bribery.
- (2)** These activities are integrated into orientation programs, in-service training, seminars, and online informational materials.

- (3) The University may organize joint activities in which its stakeholders (the business community, civil society organizations, and public institutions) may also participate.
- (4) The content of such training includes national legislation, international standards, academic ethics, and principles of good governance.

9. Reporting and Protection Mechanism

- (1) Suspicions regarding bribery, corruption, conflicts of interest, or organized crime activities within the University may be reported through a secure, confidential, and accessible reporting system.
- (2) The identities of individuals who submit reports are kept confidential and are processed solely by the authorized authorities for the purposes of the investigation process.
- (3) Individuals who submit reports shall not be subject to retaliation, pressure, or loss of rights under any circumstances. This protection covers students, academic and administrative staff, and all parties associated with the University.
- (4) An independent committee is appointed by the Rectorate within the University to receive, evaluate, and conclude reports.
- (5) The examination, verification, and finalization of reports are under the responsibility of the Rectorate and/or the Board of Trustees.

SECTION THREE **Reporting Mechanism, Monitoring, and Review**

10. Reporting Mechanism

- (1) The University establishes a secure, confidential, and accessible reporting mechanism to receive reports regarding bribery, corruption, conflicts of interest, or organized crime activities.
- (2) The reporting mechanism is open to use by students, academic and administrative staff, suppliers, business partners, and all stakeholders associated with the University.
- (3) Reports may be submitted through the following channels;
 - (a) via an online electronic system (grievance@arucad.edu.tr),
 - (b) by written application,
 - (c) by direct submission to the Rectorate,
 - (d) anonim bildirim kanalları aracılığıyla yapılabilir. through anonymous reporting channels
- (4) The identities of individuals making notifications shall be kept confidential. Whistleblowers shall not, under any circumstances, be subjected to retaliation, pressure, or any loss of rights.
- (5) The examination, verification, and finalization of notifications are under the responsibility of the Rectorate and/or the Board of Trustees.

11. Review and Disciplinary Process

- (1) All complaints regarding corruption, bribery, and organized crime submitted to the University shall be examined by the designated Committee in a prompt, fair, impartial manner, and in accordance with the principle of confidentiality.
- (2) The complaint shall first be formally accepted and recorded. Subsequently, a preliminary assessment shall be conducted to determine the seriousness, scope, and parties involved in the incident. Where deemed necessary, temporary protective measures may be implemented to ensure the safety of the parties and the proper conduct of the process.
- (3) Following the preliminary assessment, a detailed investigation shall be carried out by the Committee. Within this scope, statements of the parties and witnesses shall be taken; existing documents and digital records shall be examined; and evidence shall be collected. During the investigation process, the parties shall be granted equal opportunity to be heard, and the process shall be conducted in compliance with the principle of confidentiality.

(4) Upon completion of the investigation, the Committee shall render a decision regarding the nature of the violation and submit a report to the Rectorate. Depending on the severity of the violation, different sanctions may be imposed. For students, such sanctions may include a warning, reprimand, temporary suspension, prohibition from campus activities, or dismissal from the University. For personnel, sanctions may include a warning, reprimand, temporary suspension from duty, removal from academic/administrative duties, or termination of the employment contract. In cases involving third parties, sanctions such as termination of business relations or prohibition of access to the campus may be applied.

12. Notification and Appeal

(1) Decisions taken shall be communicated to the parties in writing, together with their justifications. The parties have the right to appeal against the decisions. Appeals shall be submitted to the Rectorate within three (3) business days following the notification of the decision and shall be reviewed in a prompt, fair, and impartial manner. The decision rendered at the conclusion of the appeal process shall be final and binding, and no further administrative remedy shall be available within the University.

13. Record-Keeping and Reporting

(1) All review and disciplinary processes shall be recorded in accordance with the principle of transparency. Personal data shall be protected in compliance with confidentiality requirements. Summary data related to the processes (such as the number of applications and resolution rates) shall be included in the annual report and submitted to the Rectorate. Where necessary, this report may also be shared with the public.

14. Monitoring and Review

(1) The University shall regularly monitor the implementation of policies related to the prevention of corruption, bribery, and organized crime.

(2) The effectiveness of the policy shall be regularly evaluated and updated where necessary.

(3) Feedback received from students, academic and administrative staff, business partners, and other stakeholders shall be incorporated into the evaluation process.

SECTION FOUR

Other Provisions

15. Matters Not Regulated

In cases not expressly regulated by this Directive, the relevant provisions of ARUCAD's applicable legislation, as well as the decisions of the Board of Trustees, the Senate, or the relevant Administrative Board, shall apply.

16. Entry into Force

This Directive shall enter into force as of the date on which it is approved by the Senate of Arkin University of Creative Arts and Design.

17. Authority for Implementation

The provisions of this Directive shall be executed by the Rector of Arkin University of Creative Arts and Design.