

ESKISEHIR EUROPEAN UNION ASSOCIATION ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. PURPOSE

The main purpose of this Anti-Bribery and Anti-Corruption Policy is to clarify Eskisehir European Union Association's policy against corruption and bribery.

2. SCOPE

Anti-Bribery and Anti-Corruption Policy

- Eskisehir European Union Association's members of board of directors
- Eskisehir European Union Association's members
- Eskisehir European Union Association's volunteer workers
- Eskisehir European Union Association's workers

3. DEFINITIONS

Transparency International defines corruption as "the abuse of entrusted power for private gain". Corruption can be classified as big, small, and political, depending on the amount of money being lost and the sector in which the corruption happens.

A bribe is a means of providing, offering or promising a benefit, directly or through intermediaries, in order for a person to perform or not perform, accelerate, slow down a task related to his or her job; request or acceptance; to act in violation of the requirements of the task by means of mediation such as the other person within the framework of an agreement with him/her or the party requesting it, or because of this relationship is to benefit someone else.

Eskisehir European Union Association's anti-corruption policy is derived from the zero tolerance for corruption approach. Zero Tolerance means that, Eskisehir European Union Association, in its works has zero tolerance regarding corruption and reports all persons being suspected to have violated the anti-corruption policy to the association's board of directors. This means that European Union Association handles all suspicions with professionalism and reviews, examines, and acts on all cases suspected of corruption fairly and transparently.

4. DUTIES AND OBLIGATIONS

As the Eskisehir European Union Association we pledge to abide by the ethical and honesty principles in all our works and conform to all legislative regulations in our field.

Executing and updating the Anti-corruption and anti-bribery policy falls within the authority, duty, and obligation of the Association Supervisory Board. Within this framework:

- Association Supervisory Board is responsible for establishing ethical, trustworthy, lawful, and controlled work environment
- Association Supervisory Board is responsible for determining and managing reporting, reviewing, enforcing mechanisms in the event that Association members violate laws or regulations

Also Eskisehir European Union Association members, volunteers, and workers:

- must abide by the Anti-Bribery and Anti-Corruption Policy, legislative regulations regarding abiding by these policies in the works of the Association or in the decision making mechanisms and must report any and all activities in violation of these policies to the Supervisory Board.

5. POLICY VIOLATIONS, OBSERVATION AND REVIEW

A member, volunteer, employee, or person acting on behalf of the Eskisehir European Union Association should be referred to the Supervisory Board if there is any opinion or suspicion that he or she is acting contrary to this policy. The members of the Eskisehir European Union Association are free to comment on the anti-corruption and anti-bribery policy and make suggestions for improvement. Suggestions, comments, and questions are directed to the Board of Directors and reviewed and evaluated by the Board of Directors.

Eskişehir European Union Association promotes an honest, fair and transparent approach to anti-corruption and anti-bribery policy.

In cases where it is possible or contrary to the anti-corruption and anti-bribery policy, the case is examined by the Supervisory Board and necessary sanctions are applied in case of inappropriate behavior.

6. RECORD KEEPING AND REPORTING

In order to ensure fiscal transparency in the anti-corruption and anti-bribery policy, Eskisehir European Union Association realizes the matters it has to comply with regarding accounting and registration system by following legal ways. In accordance, Association;

- Maintains and records all accounts, invoices, and documents relating to the third parties in a reliable, complete, accurate, and trustworthy manner.
- Is strictly against the manipulation of facts in accounting or similar business records of any transaction.

In this framework, in order to ensure financial transparency and accountability, the Association works with independent accountants and financial advisors to register financial transactions legally.

7. EDUCATION AND COMMUNICATION

Eskisehir European Union Association announced its Anti-Bribery and Anti-Corruption Policy to its members, employees, and volunteers and published it on <https://eskisehirab.org> official website for easy access.

Eskisehir European Union Association organizes in-service training programs in order to raise the awareness of its employees in its structure that adopts fairness, transparency, and accountability.

8. DONATIONS, GIFTS AND HOSPITALITY

All donations and sponsorships to the Eskisehir European Union Association must be made in an open and transparent manner. All of these donations and sponsorships are subject to the approval of the Supervisory Board within the scope of the fight against corruption and bribery.

Members of the Association, volunteers, and employees working on behalf of the Association cannot accept gifts other than symbolic gifts of low financial value. Furthermore, if accepting a gift makes the Association feel liable, the gift in question is not accepted within the Association.

It is hereby announced to the public.