



The Cultural Studies Center for Peace Anti-Bribery, Anti-Fraud and Anti-Corruption Policy Document

1. Purpose

The Anti-Bribery and Anti-Corruption Policy of the Cultural Studies Center for Peace aims to clearly demonstrate the Association's stance on the fight against corruption.

The policy document also serves as a guide for all persons, institutions, and organizations with which the Association has a relationship as a civil society organization and includes the ethical principles that constitute the core of agreements and cooperation to be made by the parties.

2. Scope

These rules, prepared within the framework of the above-mentioned resources, are valid for all administrative structures of the Association, managers, and all employees hired by the Association.

The Board of Directors of the Association is authorized to make the principles of the policy the way of functioning of all units of the Association and to take the necessary steps to be taken promptly and decisively in case of incompatibility.

3. Responsibilities

The Board of Directors of the Association is responsible for the Anti-Bribery, Anti-Fraud and Anti-Corruption Policy at the highest level. The Board of Directors of the Association accepts this policy text and provides the necessary environment for its implementation. It establishes and develops internal control systems to prevent bribery, fraud, and corruption. It ensures the establishment of the necessary communication channels for the reporting of acts contrary to this written text and takes measures to ensure the confidentiality and security of the persons making the notification.

It ensures that the necessary examinations and investigations are made about the complaints, notices, and allegations received on the issue within the framework of the Association's statute. It ensures that audits are carried out and corrective measures are taken to ensure compliance with legal regulations, statutes, procedures, and policies.

4. Definitions

Bribery: It defines the use of a person to undertake an action contrary to the requirements of his duty or out of the ordinary course of business by means of doing, not doing, speeding up or slowing down a job, directly or indirectly, within the framework of a verbal or written agreement from the other party, extracting material or moral benefit to himself or another person in link with him. Elements providing a

benefit that can be considered a bribe can be in many different forms, such as cash, gift, event invitation or ticket, debt forgiveness, or charitable donation.

Corruption: It refers to the misuse of the authority held due to the current position, directly or indirectly, for personal, financial, or moral gain.

Fraud: It means deceiving someone with fraudulent behavior and providing a benefit to himself or someone else at the expense of him or someone else.

5. Policy

The ethical rules, regulations, procedures, and other regulations of the Association for Cultural Studies for Peace support the execution of activities in accordance with the law, correctly, fairly, and honestly, and a sensitive attitude is displayed in the fight against bribery and corruption to ensure the protection of the rights of all stakeholders of the association. Anti-Bribery, Anti-Fraud, and Anti-Corruption Policy has also been implemented as a requirement of the importance given to this issue. The Association explicitly prohibits bribery and corruption in its activities in all provinces and countries.

The monetary value of the benefit stemming from bribery, fraud, and corruption, or whether some service is accomplished for the other party in return, is not important. In case the value of the interest is very low or the commitment given despite the offer has not been realized yet, it will be in violation of the Anti-Bribery, Fraud, and Anti-Corruption Policy.

The legal rights of members, employees, and other stakeholders are protected in the association. Accounting transactions are fully, accurately, and fairly recorded, and internal control systems are established to prevent unregistered transactions.

The Association requests from the organizations it cooperates with worldwide to comply with the principles, terms, and standards of the policy and to develop procedures in accordance with the policy. In line with the regulation regarding this request, no member or employee working on behalf of the association may offer or accept bribes.

In cases where corruption occurs, the Association's employees or third parties (intermediaries) do not try to hide the bribe. In such a case, it is obliged to immediately notify and denounce in accordance with the association's procedures. The Cultural Studies Center for Peace Association guarantees by the Management that people who report and complain about situations violating legal regulations, ethical rules, and association legislation will not be harmed for this reason. It is essential to keep the identities of these people strictly confidential and to prevent them from incurring any damage due to their complaints or reports.

As the Association's regulations, policies, procedures, and instructions are fully implemented in all duties of the association, the Anti-Bribery, Anti-Fraud, and Anti-Corruption Policy should be adopted and implemented by the members and employees. Violating this policy will result in the association being subject to disciplinary and criminal sanctions.

This policy was accepted and entered into force with the decision of the Board of Directors dated 01.06.2023 and numbered 6.