

## **CONFLICT OF INTEREST, BRIBERY AND CORRUPTION POLICY PAPER**

This text has been prepared to explain the institutional approach of the Media Research Association and the Media Research Association Commercial Enterprise to the Conflict of Interest, Bribery, and Corruption and to prevent conflicts of interest that may arise between the Media Research Association and the Commercial Enterprise employees, and persons and institutions that are directly or indirectly related, and to take necessary measures in this regard.

Media Research Association and the Commercial Enterprise define conflict of interest as any kind of monetary or non-monetary interest and any personal interest related to them that affect or may affect the employee's impartial performance of their duties.

Media Research Association and the Commercial Enterprise define corruption of interest as bribery, which leads to deviations in the lawful performance of duties or required behavior of the person who directly or indirectly provides bribery and illegal advantage, or as demanding, offering, giving, or accepting any other illegal benefit.

Media Research Association and the Commercial Enterprise define bribery as the direct or indirect offer of payment or benefit in order to influence decisions and practices, as gaining an illegal advantage in order to perform, not perform, speed up, or slow down a job contrary to the requirements of the duty. It is accepted that this situation can occur in many ways, such as making cash or non-cash payments, giving valuable gifts, offering an advantage to the employee that will provide personal benefit, etc.

Media Research Association and the Commercial Enterprise aim to act fairly and equally while performing all its activities. In case of an emergence of a situation that can be described as a violation within the scope of this policy, the employees must inform the unit managers, primarily, and the institution manager. If employees are hesitant about how to manage the situation, they should avoid actions and operations that may result in a conflict of interest, corruption, bribery, by refusing to participate in the proposed operation/activity and making the necessary notifications within the scope of this policy.

Specific to the conflict of interest, Media Research Association and the Commercial Enterprise undertake to disclose any potential conflict of interest before starting work, if unable to address potential conflicts of interest and their management, and if cannot ensure that it will prevent or minimize the risk of harm to the interests of its employees and the persons and institutions directly or indirectly related to them. Disclosure of the conflict of interest does not relieve the Media Research Association and the Commercial Enterprise from its obligation to develop and implement effective measures. Disclosures must be timely and concretely, fair and clear, and not misleading.

In the cases of conflict of interest, corruption and bribery is detected or occurred, the Media Research Association and the Commercial Enterprise will consider not reporting or ignoring the violations as a violation of this policy document.

Media Research Association and the Commercial Enterprise employees are expected to act in accordance with the rules set forth in this policy while performing their duties.

Violation of this policy in any way will be approached as a serious matter by the Media Research Association and the Commercial Enterprise; which may result in disciplinary sanctions and/or other legal remedies, including termination of the contract.

Media Research Association and the Commercial Enterprise employees, within the scope of the work under their responsibility;

- Avoid causing situations that will create a conflict of interest or the impression in favor of themselves or their relatives, and do not take part in the decision process on matters concerning their own or their relatives' interests.
- Do not enter into any personal financial relations with any individuals receiving services, persons, and institutions directly or indirectly related to them, and do not gain personal benefits by using business relations.
- Do not allow offers of gifts or benefits that may affect their decisions and consent or create a conflict of interest.
- Use the assets and resources of the Institution efficiently only for the benefit and advantage of the Institution, and cannot directly or indirectly use worktime and the Institution's resources for personal and/or political activity and benefit.
- Avoid conflicts of interest that may provide unfair benefits in favor of themselves, their relatives, or third parties, by making use of title and authority.
- Inform the manager they are affiliated with, in case that persons and institutions directly or indirectly related or persons in the primary decision-making position regarding the same business as the supplier institutions and organizations are first degree relatives, or in case that it is learned that their relatives have shares or financial interests in another company with which they have a commercial relationship.
- Use their time and effort for the institution, do not undertake any other responsibility that may create a conflict of interest, do not make personal investments that may cost their time and effort and create a conflict of interest, and cannot work for another real or legal person outside the company.
- Act in line with the principles of honesty and transparency, and maintain distance and impartial relations, in their relations with public institutions and organizations.
- Protect the secrets of the institution and customers, and do not take out information that provides a competitive advantage and is confidential to the institution.
- Do not use the information they have obtained as part of their duties, in a way that will lead to an unfair gain in favor of themselves, their relatives or third parties, or they do not cause harm to the institution or all individuals who receive service, and the persons/institutions that are directly or indirectly related.
- Employees who, after leaving their duties, personally establish or become partners with any kind of NGO, company, etc., conducting business with the Media Research Association and the Commercial Enterprise as a seller, contractor, paid consultancy, brokerage, representative, dealership, or similar forms, is a very important issue that may create negative perceptions and that should be taken into consideration. Before or after such a process, it is necessary to act within the framework of the interests of the Media Research Association and the Commercial Enterprise, to comply with our moral and ethical rules, and not to allow conflicts of interest before and after the process.

- If there is an inappropriate situation, a relationship that can be considered commercial should not be established with the person in question. Such relationships are possible with the approval of the manager.
- Employees of the Media Research Association and the Commercial Enterprise cannot be employed for a paid or unpaid job in another NGO, company, etc. without written approval.
- Cannot demand, obtain and accept any goods/services that exceed the symbolic value (which is \*250.00-Turkish Liras) or any transaction, cash, check, etc., regardless of its value, that may give the impression that they are given for the purpose of encouraging the realization of any business.
- Do not accept gifts or incentives that may affect or aim to influence the choices and decisions of the Media Research Association and the Commercial Enterprise; such requests should not be made. However, in cases where it is decided that returning the gift costs more than the above-mentioned symbolic value is impractical or may lead to an undesirable result in terms of the business relationship, the acceptance and use of the gift in question can only be deemed appropriate with the written approval of the manager. In the case of a gift, if it is of high value, donating it to a charity should be taken into consideration.
- Political donations cannot be made on behalf of the Media Research Association and the Commercial Enterprise.
- The aid contributions and sponsorships to be requested must be legal, in line with the policies and regulations to be issued by the Media Research Association and the Commercial Enterprise, and in compliance with the legal legislation.
- Before making any aid contributions, donations, or sponsorships, necessary preliminary research is carried out and measures are taken to reduce the risk so that it is not considered as a bribery and corruption activity.