

# ETHICS POLICY AND CODES OF CONDUCT GUIDE

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# PURPOSE AND DEFINITION

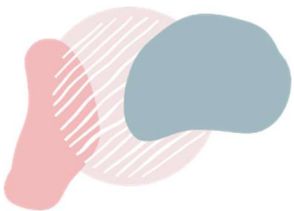
## Why Ethic Principles?

**Mother and Child Education Foundation** is a civil society organization which acts to ensure that each child at early ages is safe, healthy, happy and learning, and tries to decrease inequalities in society through education. Fundamental values in the heart of our works are **respect to life, being scientific, continuous improvement and transparency**. Following some specific conduct standards in our works by protecting these values is expected from all employees and volunteers who contribute to AÇEV. Acting in conformity with our mission and values is very important for AÇEV to sustain the assurance and reputation it gained in society, thus create the social benefit it aims.

## What is Included in Ethic Principles?

**AÇEV Ethics Policy and Codes of Conduct Guide** defines the outlines of general conduct standards expected from all Foundation employees and volunteers in their daily activities and their relations with the organizations and people with whom the Foundation does business, groups that it provides education and all third parties with which it performs activities. Also, it regulates the relations with local and international public or private institutions and officials, public officials, citizens and all education and program participants that it reached with projects.

**Ethics and Codes of Conduct** is not a comprehensive document aiming to predict all legal and ethical possibilities that may be faced with, or defining all rules and policies to be applied within the scope of Foundation's activities. **This document is a guide aiming to draw attention to legal and ethical matters that may be encountered during the daily activities of the Foundation.**



## SCOPE

All full and part time AÇEV employees, AÇEV volunteers and sub-contractors are responsible for the codes of conduct in this guide. Accordingly, this ethics guide can be shared with all people and organizations that AÇEV is in contact with.

## EXECUTIVE

It is **AÇEV Ethics Committee's** responsibility to document that the most recent version of **AÇEV Ethics Policy and Codes of Conduct Guide** is read and understood by the employees and volunteers and that they commit to implementing it. The members of the **Ethics Committee** are defined every two years. A total of 5 full members are present in the **Ethics Committee**; 1 from the Executive Board and 4 among employees. Additionally, 5 associate members are selected from the Executive Board and employees. Executive Board members and employees internally determine the members that will join the Committee. Employees in the Committee consist of 4 people among the candidates who get the most number of votes from the employees. If there are no volunteers among the employees, members are determined by the people invited by the chairman of the Ethics Committee upon their acceptance. A gender, age and experience balance is considered among the Committee members. The balance of executive team and employees is considered among the Committee members. In addition to the central team, there is space for field and other central members at the Committee. The Committee members organize task allocation among themselves and determine the responsible people such as the Committee President, reporter, etc.

The **Ethics Committee** updates the guide once a year in November and submits it to the approval of top executives. In case an infringement is identified, the Committee executes the necessary internal discipline process with the approval of top executives. If in doubt, it is essential to have the opinion of the Board of Management.

It is ensured that the members of the Committee receive the educational and psychological support they need.



## OPERATION

The **Ethics Committee** holds a revision meeting every year in November to make necessary revisions to this document. Additionally, the **Ethics Committee** gather upon complaint in case the codes of conduct noted in this document are breached. The complaint can be sent to an email address and phone line reserved for notifications or any Committee member (*including digital means*) and it will be handled urgently. The **Ethics Committee** evaluates the case in the concerned complaint in detail, conducts necessary discussions and information collection activities and makes a unanimous decision. In cases when the complaint received by the **Ethics Committee** is related to a Committee member or an acquaintance of a Committee member, such member cannot be involved in the evaluation and decision processes. Such person is replaced by another person assigned to the Committee by the General Manager or the Board of Management. In case the complaint is related to a top executive or a Committee member, the complaint should be made via the phone line connected to the central operator. Thus, the complaint is directly forwarded to a Committee member who is not the subject of the complaint and handled by a different member. A psychologist, a social gender expert and a child development specialist among employees can be present during the Committee meeting depending on the concerned matter. When deemed appropriate by the **Ethics Committee**, an external expert can be invited to the Committee for consultancy.

Regarding the cases submitted to the Committee, the investigation is started in accordance with the Investigation and Information Collection Procedure attached to this document. The Committee process is conducted by respecting all fundamental rights of the complainants and the complained people, in accordance with confidentiality and security principles, and with dignity. Universal practices such as presumption of innocence and burden of proof are observed in cases received by the Committee. Cases submitted to the **Ethics Committee** are registered with a code and reported to the General Manager annually. A discipline procedure is started for the person who breaches the privacy and safety principles.

The **Ethics Committee** conducts preventive activities regarding the behaviors that are included in this document and may be subject to the complaint. Accordingly, it is ensured that the employees have basic training on protection of children and gender equality, and this information is included in the employee orientation. Also this document is published on the Foundation's official communication channels so that it is accessible to everyone.

For situations that cannot be clearly defined in the **Ethics Policy and Codes of Conduct Guide**, the **Ethics Committee** members can be consulted.



# MAIN PRINCIPLES



## 1. COMPLIANCE TO THE LAWS IN FORCE

The policy of the foundation is based on conducting its activities at the highest ethics and moral levels as well as **absolute compliance to all laws and regulations related to its works**. All Foundation employees and volunteers act in compliance with the national and also international regulations of which Türkiye is a party and take the universal human right norms as their basis. Compliance with laws does not mean only complying with the mentioned laws, but also ensuring preservation at the same time.

## 2. ETHICS IN RELATIONSHIPS WITH PEOPLE AND ORGANIZATIONS

### 2.1. AVOIDING DISCRIMINATION, ABUSE AND INFRINGEMENT OF CHILD RIGHTS

In line with AÇEV's **respect to life** principle; employees and volunteers should give first priority to **rights and freedoms** protected by laws and **human dignity** in their acts.

AÇEV considers **human dignity** as the first priority in its all written, printed and digital materials, and also while choosing image and messages. It avoids images and messages that stereotype people, situations or places, and that are based on discrimination. It obtains complete consent of concerned people in the messages and visuals used. It respects people's preferences with regards to using their names.

The Foundation is obliged to provide a safe, organized and healthy work and activity environment where no kinds of **discrimination** (*gender, ethnic origin, religion, sect, physical appearance, life style, etc.*) and **abuse** (*emotional, sexual, physical, verbal*) are allowed. Employees and volunteers have a huge role in ensuring this environment and they are expected to show other people the respect, collaboration and seriousness that they would expect from others. The standards and procedures that the Foundations accepts to apply in this regard are explained in detail in the **Quality Standards** documents.

## Discrimination:

The Foundation's employees and volunteers **do not discriminate** against anyone because they are from different cultures or countries, due to their education and socio-economical background, gender, ethnic or racial origin, beliefs, political opinions, language, religion, clothing styles, sexual orientations, sexual identity, disability, age, state of pregnancy, marital status or seniority, within any activity that suits the Foundation's education or purpose. The Foundation also ensures that all its employees are treated non-arbitrarily and equally in line with laws. This is valid in all areas of its business life including education programs and activities, onboarding of employees, promotion within the Foundation, compensation, discipline and dismissals.

AÇEV considers **gender equality** as a fundamental condition for fully realizing human rights and makes it an inseparable part of its works.

It understands that women, men, girls and boys have different needs and abilities to cope with challenges, and considers these while implementing its duties. Accordingly, it provides equal rights in employment, business relationship process, remuneration, participation in training, dismissal, retirement and all employment conditions.





## Abuse and Violence:

In all centers, offices, education and programs of the Foundation, no types of **verbal or non-verbal violence and abuse** are tolerated. Violence may happen physically, psychologically, sexually, economically and digitally. Also, insisting on flirting and persistent pursuit are intolerable behaviors within this scope. Annoying behaviors such as inappropriate comments, jokes and physical contact may be considered as abuse, even if they do not contain the purpose of abuse. Employees and volunteers should avoid words and behaviors that may be considered as abuse by others. Situations below indicate the presence of a violence and abuse case:

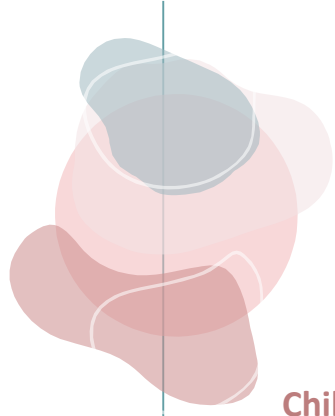
- Breaching the bodily inviolability of a person with behaviors that are not based on such person's consent,
- Words, manners or other behaviors with sexual attributions that are not based on the person's consent and do not need to be continuous,
- All types of sexual manners and behaviors causing the person to worry about his/her safety by the use of actual, verbal, written or any other communication channel, thus creating physical and psychological fear and helplessness in the person and keeping the person under pressure,
- Promising all kinds of privileges that include obtaining an award, promotion, score and similar things which are not originally deserved in exchange for accepting sexual or emotional behaviors or offers,
- Making someone's business or educational life difficult for revenge implicitly or explicitly due to the reason that the person rejects sexual or sentimental attempts and offers, or wants to file a complaint thinking s/he is abused.

- The Foundation forms a separate directive and Committee to prevent sexual abuse and violence. This Committee takes responsibility in making definitions about sexual abuse and violence, conducting preventive activities, determining and executing application and enforcement processes. At the same time, sources are reserved for the survivor to provide him/her the psychological and legal support needed.

## Sexual Exploitation and Abuse:

Sexual exploitation and abuse is defined as “actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another” by United Nations. AÇEV employees and volunteers does not behave in a way that may fall under the scope of sexual exploitation and sexual abuse towards its beneficiaries under any circumstance, and if they do, this will result with the discharge of such person. AÇEV grounds on 6 main principles of UN Inter Agency Standing Committee (IASC) in fight against sexual exploitation and abuse and these principles are considered as an inseparable annex to this guide.



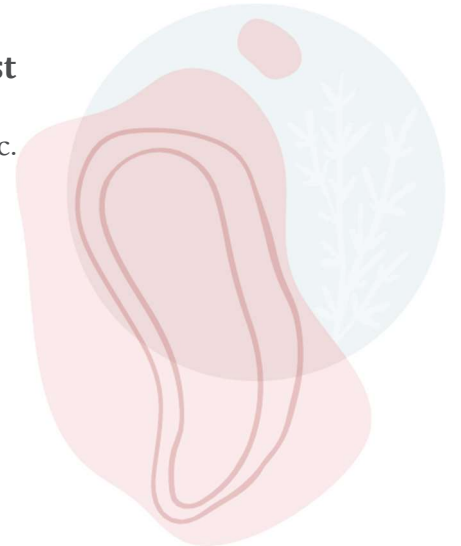


## Child Protection:

AÇEV considers **child protection approach** as an inseparable part of its professional works as it has intense education activities aimed at children.

The Foundation is obliged to inform its employees and volunteers about **Child Protection Policy and Procedures** and related behaviors; and the employees and volunteers are obliged to understand and apply these rules. AÇEV employees and volunteers do not breach the international child rights and United Nations Convention on Child Rights, and they do not support or tolerate its infringement. Infringement of **child rights** include but not limited to; early marriage, child labor, child trafficking and sexual abuse of children. The Foundation does not tolerate sexually or physically inappropriate or provocative behaviors, disrespectful, abusive, exploitative and discriminative behaviors, sentimental abuse such as embarrassing, humiliating, despising children in any situation, it does not take photos, videos, etc. that dishonors and humiliates children, and never uses such materials in AÇEV publications. In this regard, when an AÇEV employee or volunteer encounters child negligence and abuse, s/he is obliged to report the situation to the concerned officers included in AÇEV's **Child Protection Information Document**. AÇEV does not collaborate with or receive services from third parties which benefit from child labor.

**Child Protection Policy Document of the Partnership Network to Prevent Violence Against Children**, of which AÇEV is a member, is accepted as a reference document to evaluate situations under this topic.





## 2.2. AVOIDING CONFLICTS OF INTEREST

**Conflict of interest** means all kinds of interests that affect or may affect employees and volunteers to fulfill their duties objectively, and all kinds of interests provided to themselves, their acquaintances, friends, or people or organizations that they have a relationship with, and having material or personal interest in such. Employees and volunteers should not use their positions requiring trust and confidence for their personal interests. All decisions related to the activities performed should be made by **considering only the Foundation's interests**. Because of this, behaviors that conflict with the Foundation's corporate interests should be avoided and in situations requiring the contrary, the Foundation's administration should be informed in prior and their consent should be waited for. Employees and volunteers should not gain advantage or provide advantage to any person or organization from any initiative, possible activity that they will be informed of and which falls under the Foundation's field of activity or in which the Foundation's name is used without the prior written consent of the Foundation. Some scenarios that may be an example of conflict of interest in the Foundation's works are provided below:

- An employee involving in another activity that will prevent him/her from spending his/her efforts and energy for his/her job at AÇEV
- An employee forwarding a work area or opportunity, which AÇEV might consider, to another organization
- An employee being involved in a decision process as a decision maker with regards to employment of a family member or acquaintance
- An employee using the Foundation's sources for himself/herself or his/her acquaintances.

However, voluntary educators are obliged to act in conformity with the entire AÇEV Education Principles Agreement, they do not enter any physical, emotional, economical relationship with the children and their families other than the educator-participant relationship throughout the education program. The educator keeps possible professional relationships and expectations that may arise from his/her profession out of the education program.

There may be different situations causing the possibility of conflict of interest. Employees and volunteers should use their judgment to identify such situations.

The employee should report any situation that gives or may give rise to a possible conflict of interest or a perception of such to the **Ethics Committee**.

Employees providing mentorship, guidance, counseling, etc. services in their expertise areas at various institutions or performing academic activities cannot be evaluated within this scope, provided that these do not hinder their own jobs.

## Forgery, Bribery and Corruption

People should be honest and objective in their relationships with all people and local or international public or private institutions and volunteer groups with which the Foundation is in a relationship.

AÇEV has adopted the zero tolerance policy regarding forgery, bribery and corruption. Accordingly, it aims to commit to the highest standards in corporate governance.

**Forgery, bribery and corruption do not coincide with our fundamental values, which are respect to life, being scientific, continuous improvement and transparency.**

Such situations infringe the trust that our donators and beneficiaries feel for us.

AÇEV describes these concepts as below:

**Forgery:** Any act or negligence that intentionally mislead or tries to mislead another party in order to obtain material or intangible benefit or to avoid an obligation.

**Bribery:** Giving, paying, promising or offering a valuable asset or granting authority to give, pay, promise or offer a valuable asset to influence a person or organization to act in an inappropriate way.

**Corruption:** A person's misuse of his/her authority or duty within AÇEV for personal gains.



## 2.3. ACCEPTING GIFTS AND HOSPITALITY

AÇEV employees and volunteers can accept gifts within the scope of courtesy rules and in a reasonable amount from an organization, supplier, potential sellers, and an organization it does business or aims to do business with AÇEV through another establishment.

However these gifts

- should not be cash or cash equivalents.
- They should not influence the business related decisions of AÇEV employees and volunteers and they should not be given in return for a certain act or inaction.
- They should be presented transparently and registered when necessary.

Modest food or beverage, and handmade gifts that do not have any significant monetary value can be accepted in order to comply with social norms during meetings and visits.

Gifts and business related hospitality offerings given to internal and project partners, consultants, educators, supporters and other stakeholders during AÇEV's own activities, education and meetings should be in amounts, which are considered as normal under courtesy rules, and documented.

## 2.4. ACTING IN FAVOR OF THE INTEREST AND REPUTATION OF THE FOUNDATION

All employees and volunteers of the Foundation act by considering AÇEV's mission and values and codes of conduct stated in this ethics guide before public, during education programs and Foundation's all kinds of organizations. In this regard, employees and volunteers cannot make statements to public, press or through their private personal social media accounts (including their own private information), which discredit, harm the reputation or risk the works of the Foundation, its executives or another employee and volunteer; which may produce a result against the interests of the Foundation or any donator or any organization that the Foundation collaborates with; which include details about the Foundation's organizations, all kinds of education activities or harm the reputation of the Foundation's participants and volunteers, nor share any content prepared with similar nature.



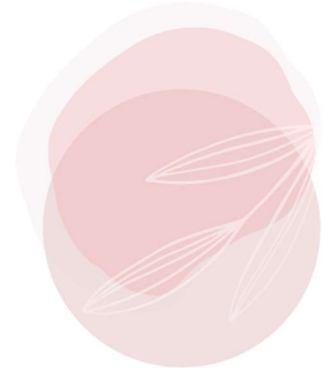
## 2.5. PERSONAL INFORMATION AND NON-PUBLIC, CONFIDENTIAL INFORMATION

**Confidential and non-public information** contains information and personal secrets about all existing and aimed-to-win education and activity participants, existing and potential donators, all donator institutions where projects are carried out; and other “internal” information such as information about the staff and existing or prepared program details with copyrights owned by AÇEV. **All employees and volunteers are obliged to keep information about the Foundation’s education and related activities confidential both while they are working at the Foundation and after their duty is terminated regardless of its reason.** Disclosing such information early or inappropriately may harm the Foundation. Also, all non-public correspondences containing confidential information, printed documents or records as well as Foundation’s records are the properties of the Foundation, and they are kept at the Foundation after the termination of labor contract.

This includes both information about fees and other allowances, and more basic topics such as social security number, home phone number and home address. The right of access to these information is limited to the people who have to obtain this information as required by their duties. No one should give personal information about the Foundation employees, volunteers and participants to third parties without prior written consent of the General Manager due to security reasons.

AÇEV is obliged to use all types of data that are to be shared with it and defined as **Personal Data and Sensitive Personal Data** within the scope of Law no. 6698 and related other legislations, only and solely within the scope of agreements it makes. AÇEV cannot transfer these data to third parties or organizations, or use them in any activity for another reason in any way. AÇEV is responsible from ensuring the safety of this information.

**AÇEV cannot use, process, distribute personal data it gains for any work that is outside its purpose, neither transfer them to third parties or organizations or abroad.**



## Copyright, Intellectual Property

Information produced for AÇEV belongs to AÇEV unless there is an individual provision placed in agreements by the fund donator / grantor. AÇEV employees and volunteers cannot reproduce, distribute or use such information without AÇEV's consent even if their business relationship with AÇEV is terminated. AÇEV employee / volunteer uses the information, picture, etc. that do not belong to him/her within the respect for copyrights.

## 2.6. RESPONDING TO EXTERNAL INFORMATION REQUESTS AND COMMUNICATION WITH THE PRESS

Employees and volunteers should observe some ethical considerations in their relationships outside the Foundation and with organizations, **in line with AÇEV's transparency principle.**

The Foundation is obliged to give complete and correct information about matters related to all financial topics and activities while informing society, press and other official authorities. In order for the Foundation to fulfill this obligation, employees and volunteers, who encounter information requests regarding an activity, its consequences, plans, position or another consideration of the Foundation in matters related to the public, or who are contacted outside their normal duty process, should report the situation to the concerned Unit Manager. Investigations made by the press should also be reported. Matters related to representation of the Foundation are included in the Source, Communication and Defense Procedure.





### 3. ETHICS IN INTERNAL OPERATION OF THE FOUNDATION

#### 3.1. ASSET PROTECTION

**Various Foundation assets are consigned to employees and volunteers and these employees and volunteers are responsible for protecting such assets.** Financial assets and computers, other equipment, supply materials and other assets belonging to the Foundation are included among these assets. The Foundation sources should be used only for performing the Foundation's activities.

#### 3.2. INTERNAL AUDIT AND ACCURACY OF RECORDS

**The Foundation's Board of Management and donators trust that the Foundation sends them accurate records about its activities in order for them to make responsible decisions based on reliable records.**

The Foundation's accounting books and records, and all supporting documents should reflect each process they contain accurately and honestly.

Incorrect, misleading or misrepresented data should not be entered in the Foundation's books and records, regardless of any reason. All employees and volunteers are responsible for ensuring that processes related to all education programs and activities are approved properly, defined correctly and recorded in financial statements timely.

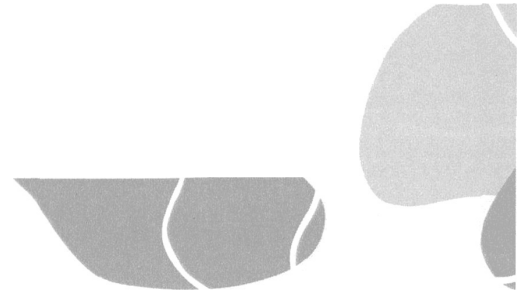


### 3.3. WORK ORDER IN THE OFFICE, EMPLOYEE RELATIONS AND WORK-LIFE BALANCE

**The Foundation's employees and volunteers adhere to the codes of conduct in order to ensure an efficient and compliant working environment in line with AÇEV's principles at AÇEV's head office and centers.** As a principle in the workplace environment, employees and volunteers care for the physical and psychological needs of others, try to be kind and honest in their communications and behaviors, do not share malicious information about people, respect cultural differences and be open to utilize each other's specific experiences and points of view. Any conflicts arising from the absence of these can be escalated to the **Committee**.

#### **Mobbing:**

The Foundation's employees and volunteers must be aware of **mobbing** behaviors, which can be defined as continuous and systematic defamation, humiliation, offending, abasement, exclusion, threatening, suppression, slandering, rumoring, accusation, criticism to the extent of defamation, scribble, menacing, disciplinary punishment by faking crime, corrupting personal records and similar behaviors, and these are behaviors that should never be performed.



## **4. COMPLIANCE COMMITMENT**

Violation of the code of conduct set out in this guide is a serious offense, as described above, and may result in disciplinary action, suspension, termination, lawsuits by the Foundation, or fines, penalties or other legal sanctions in case of violations of the law. Everyone within the scope is individually responsible for compliance with the ethical principles and codes of conduct set out in this guide.