

UNITED NATIONS  
GLOBAL COMPACT  
COMMUNICATION  
ON ENGAGEMENT

TEİD – ETİK VE İTİBAR DERNEĞİ  
TURKEY

2017 - 2019

BARBAROS MAH. MOR SÜMBÜL SOK. VARYAP MERIDIAN I BLOK KAT 5 D.66 BATI  
ATAŞEHİR – İSTANBUL - TURKEY

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## About TEİD – Ethics and Reputation Society

**The Ethics and Reputation Society (Etik ve İtibar Derneği – TEİD - <http://www.teid.org/>)** is a not-for-profit, non-governmental organization founded in 2010 with competence in integrity risk management and anti-corruption aiming to develop and encourage adherence to internationally recognized business ethics principles within the Turkish business environment. TEİD acts as a point of reference for private sector companies to implement the principles of business ethics and with the public sector in the pursuit of a socio-economic environment that incentivizes compliance with these principles.

TEİD not only guides the companies to create their business ethics policies and principles, but also helps them adapt these values to their administrative and commercial functions.

TEİD vision is to create a cultural change in the Turkish Private Sector and train compliance officers who will effectively manage integrity risks for their companies. In that respect, TEİD is collecting data on corruption and integrity through regular surveys on business community. We produce and deliver courses and online training modules and run “Ethics and Compliance Officers Certification Programs” for the education and certification of relevant private sector professionals. TEİD designs tools for the use of compliance officers. TEİD creates stakeholder engagement strategies, execute the communication plan and conduct event management for higher visibility and effective communications.

TEİD has over 145 corporate members with a total yearly income that exceeds 15% of Turkey’s GDP employing more than 250.000 persons. All our corporate members are signatory of TEİD’s Integrity Pledge, which is Turkey’s biggest cross-sectoral collective action initiative.

TEİD has established the Turkish Integrity Center of Excellence (TICE) [www.tice.org.tr](http://www.tice.org.tr); the Private Sector Collective Action Center (ÖSKEM) [www.oskem.org.tr](http://www.oskem.org.tr) and is the founder of “Business Ethics Application and Research Center” within Istanbul Bilgi University.

TEİD’s roles in international anti-corruption efforts and memberships:

- B20 Anti-Corruption Network member
- B20 Turkey Anti-Corruption Taskforce member
- B20 Turkey Anti-Corruption Taskforce, “Combating Corruption in Customs workstream leader
- OECD’s Anti-Corruption Network and Regional Anti-Corruption Advisory Board member
- UNODC’s Anti-Corruption Network Member
- Globethics Network Turkey regional representative
- European Business Ethics Network member.

TEID tries to facilitate collective actions:

- to create a point of leverage before the regulators,
- to affect regulatory change in combatting with corruption and effective management of integrity risks,
- to enhance the commitment of the private sector with a strong advocacy program,
- to become a point of reference for business ethics and compliance related matters.

TEID has also advocated for the ethics and compliance manager as a profession and had prepared the profession profile, description and standards with authorities. The official national ethics and compliance manager occupational standard has been published on the Official Gazette on June 2018.

Parallel to this advocacy, TEID has established TEID Akademi, a certification program for “Corporate Ethics and Compliance Management”. The program has finished its 5<sup>th</sup> edition and we now have more than 100 certified ethics and compliance managers in Turkey. The certification program consists on a 42-hours program together with a practicum to be prepared and presented at the end of the program.

In a short amount of time after it was established, TEID was accepted as a Global Compact Member; therefore, immediately upon establishment, TEID started to consider the Global Compact Ten Principles in every action.

In addition, TEID motivated its members to adopt the Global Compact Ten Principles and consider these principles in their daily business life.

The most significant application to impose these principles upon its members, TEID prepared the TEID Cross-Sectoral Integrity Pledge to be signed by each of its members in order to declare their commitment to the principles of TEID and Global Compact. With this bond, they announce their responsibility to abide by these principles in every administrative and commercial activities they lead, as well as spreading these principles to their employees and shareholders.

## TEID Letters of Commitment

Ms. Lise Kingo - CEO & Executive Director

United Nations New York, NY 10017  
USA

Dear Ms. Secretary General,

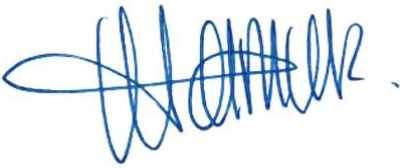
1.10.2019

I am pleased to confirm that Ethics and Reputation ports the ten principles of the UN Global Compact with respect.

With this commitment, we express our intent to advance these principles within our sphere of influence and will make a clear statement of this commitment to our stakeholders and the general public.

We also pledge to take part in the activities of the UN Global Compact where appropriate and feasible – through, for instance, participation in Country/Local Networks; involvement in specialized initiatives and workstreams; engagement in partnership projects; and reviewing and providing commentary to participating companies on their Communications on Progress.

Sincerely yours,



Neslihan Yakal

Secretary General

1.10.2019

To our stakeholders:

I am pleased to confirm that TEİD – Etik ve İtibar Derneği (Ethics and Reputation Society of Istanbul/Turkey) reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labor and Inclusive Workplace, Environment, Fight Against Poverty and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents.

In this Communication of Engagement, we describe the actions that our organization has taken to support the UN Global Compact and its Principles as suggested for an organization like ours. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,



Neslihan Yakal

Secretary General

## TEID Leading Advocacy on Transparency Through Collective Actions

### A. Sectoral Collective Actions

To disseminate the Principles of Global Compact, TEID also works with other NGOs. TEID continues to create platforms for collective actions.

Professional Ethics Standards are prepared with various associations, including Turkey's major sectoral associations such as KOTEDER (The Association of Listed Companies' Executives), TÜYİD (Turkish Investor Relations Society), İGMD (Istanbul Customs Brokers Association) and DPİD (Direct Marketing Communicators Association)

- a. Publicly Traded Companies Ethics Standards with KOTEDER
- b. Investor Relations Professionals' Ethics Standards with TÜYİD
- c. Customs Brokers Professional Ethics Standards with İGMD
- d. Direct Marketing Communication Professionals' Ethics Standards with DPİD

have been prepared, launched and respective trainings have been given to major sectoral actors to multiply adherence to those standards.

### B. Cross-Sectoral Collective Actions

By its establishment and its by-laws, TEID represents a cross-sectoral collective action. All TEID corporate member signs the TEID Integrity Pledge at the time of its membership and they declare to respect the TEID Integrity Pledge.

In a short amount of time after it was established, TEID was accepted as a Global Compact Member; therefore, immediately upon establishment, TEID started to consider the Global Compact Ten Principles in every action. In addition, TEID motivated its members to adopt the Global Compact Ten Principles and consider these principles in their daily business life. The most significant application to impose these principles upon its members, TEID prepared the TEID Cross-Sectoral Declaration of Ethics to be signed by each of its members in order to declare their commitment to the principles of TEID and Global Compact. With this bond, they announce their responsibility to abide by these principles in every administrative and commercial activities they lead, as well as spreading these principles to their employees and shareholders.

The number of corporate members signing TEID's Integrity Pledge has now reached 145, they represent a significant portion of 15% of Turkish GDP and employ more than 250.000 person.

In addition to its commitment to the Global Compact Principles, TEID is also one of the participants of "The Call to Action" which is an appeal by the private sector to governments to promote anti-corruption measures and to implement policies that will establish systems of good governance. "The Call to Action" urges governments to underscore anti-corruption and good governance as fundamental pillars of a sustainable and inclusive global economy.

## Global Compact Principles: Anti-Corruption

According to World Bank data, the money paid for bribery in the world each year is more than 1 billion dollars. It is a fact that the existent corruption in the world leads to a 20% increase in cost of business in developing countries' economies. Therefore, in order to ward off bribery, private sector and the state should work together as it is a common enemy.

As TEİD, we are aware of the importance of this situation for our country and for the world, and we are leading many national and international practices to stop corruption.

## Turkish Integrity Center of Excellence – TICE

Turkish Integrity Center of Excellence (TICE) is one of TEİD project which aims to level the playing field by inclusion of the private sector into combatting corruption. Details of the project can be found [here](#).

Businesses seldom have appropriate expertise to implement internationally developed anti-corruption and good governance guidelines and standards. Assessment of improvement is hardly possible due to non-existing coherent data regarding socio-economic effects of corruption on leading sectors of the local economy.

Many companies have some sort of ethical standards but what they don't have is a compliance program to turn those standards into the very basis of their written corporate culture. Consequently, business ethics remain a soft skill for the companies rather than a value and an asset to be measured, reported and effectively managed. Our vision in this project is to create a cultural change in the Turkish Private Sector and train compliance officers who will effectively manage integrity risks for their companies.

TICE is a platform that will impact the Turkish Business both nationally and internationally in increasing its compliance standards.

We do not only act as a point of reference for the private sector companies assisting them to implant the principles of business ethics but we also work closely with the legislator in the pursuit of a socio-economic environment where companies act in compliance with those principles do not lose their competitiveness but gain advantages.

## Education, Trainings and Professional Certification

To produce and deliver courses and online training modules and runs "Ethics and Compliance Professionals Certification Programs" for the education and certification of relevant private sector professionals and produces tools for the use of compliance officers.

In parallel with the Ethics and Compliance Manager Certification Program, which started on November 5, 2016, TEİD was appointed by the Ministry of Labor and Social Security, Turkish Vocational Qualifications Authority to prepare the Occupational Standards of Ethics and



Compliance Managers. After being published on the Official Gazette on June 2018, the Ethics and Compliance Profession has now a recognized status as a profession in Turkey.



Turkish Authorities have announced the “National Profession Standards of Ethics and Compliance Manager” Level 6.

The Standards address the role and responsibilities for an Ethics and Compliance Manager. They address requirements, the working environment and conditions, tools and equipment to be used, as well as codes of conduct which must be followed. They also cover measurement, evaluation and documentation systems.

Accordingly, an Ethics and Compliance Manager is responsible for:

- Establishing and implementing ethics and compliance programs, as well as related policies and procedures.
- Identifying roles and responsibilities within the organization.
- Establishing communication mechanisms within the framework of legislation, service procedures, quality requirements, risk management priorities and ethical principles which the organization is subject to.
- Conducting briefings, trainings and awareness studies regarding implementation of the ethics and compliance program.
- Monitoring, reporting and updating the program and keeps track of violations and notifications.

The Professional Standards were prepared by TEID, the Ethics and Reputation Society, upon delegation by [the Turkish Profession Standardization Institute](#) and published in Official Gazette number 30446 on June 9, 2018. Please see [this link](#) for [full text of the Standards](#).

## The Business Ethics Research and Application Center

Aside from these works, TEID also realizes the importance of Academia. With the collaboration of Istanbul Bilgi University, TEID has opened the “Business Ethics Research and Application Center” on March 2015. This center includes certificate programs as well as 2-year programs

that will consist of topics of ethics and compliance program, ethical risk management, anti-corruption regulations.



## Communications and Publications

To create stakeholder engagement, TEİD strategize and execute the communications plan and do event management for higher visibility and effective communications.

### INbooks

INbooks are complimentary books for our members and shareholder about business ethics, ethics and compliance management, anti-corruption etc. They are prepared in order to increase the awareness about these topics and as a contribution to Turkish literature. Our INbook collection:

- “The Honest Truth About Dishonesty How we Lie to Everyone - Especially Ourselves”, D.Ariely
- “What Money Can't Buy: The Moral Limits of Markets”, J.Sandel
- “How to Pay A Bribe?” a TRACE book by Alexandra Wrage and Severin Wirz with contributions of Jeffrey D. Clark, Musikilu Mojeed, Matteson Ellis, Barnaby Pace, Andrew Feinstein, Ken Silverstein, Kathleen Hamann, Daniel Jordan Smith, Paul Holden, Amy L. Sommer
- “Social Responsibilities of Board of Directors”, TEİD – Argüden Academy collaboration by Dr. Yılmaz Argüden, Former President of Board of Global Compact Turkey)
- “Ethics and Business: An Introduction”, K.Gibson

### INexlibris

INexlibris is an online library that includes all kind of researches, dilemmas, guides etc. about ethics and compliance programme, anti-corruption, business ethics, corporate governance etc.

### INmagazine

INmagazine, is the first business ethics, compliance and integrity themed magazine, a quarterly published in Turkey.

So far, 15 INmagazines are published including more than 350 articles of more than 60 authors. INmagazine can also be read online. INmagazine all issues can be found [here](#).

## INguide

Our series of guides to guide Ethics and Compliance managers in their daily lives; We published a total of 15 guides:

1. Ethics Reporting Guidelines,
2. Ethics Committee Guidelines,
3. Collective Action Guidelines,
4. Whistleblowing and Retaliation Guidelines,
5. Gift and Hospitality Policy Guidelines,
6. Ethics Management for SMEs Guidelines,
7. Cyber Compliance Guidelines,
8. Managing Conflict of Interests Guidelines,
9. Social Media and Ethics Guidelines,
10. Ethics Culture Guidelines,
11. Competition Law and Ethics Guidelines,
12. Data Protection Regulation Compliance Program Guidelines,
13. Internal Investigations Guidelines,
14. Case Study Book no. 1
15. Case Study Book no. 2

## Advocacy

To facilitate collective actions, to create a point of leverage before the regulators, to affect regulatory change in combatting with corruption and effective management of integrity risks, to enhance the commitment of the private sector with a strong advocacy program and to become a point of reference for business ethics and compliance related matters.

## Diversity and Inclusiveness at Workplace

“The Unbearable Appeal of Diversity” Event on September 28, 2018

An event has been organized about managing efficiently diversity in the private sector and the sharing of statistical data and legal obligations and see the current situation in Turkey. The event was moderated by Prof. Dr. Ali Murat Vural, TEID Board member and the speakers were Ms. Nuran Aksu, Zenna Consulting Managing Partner, Ms. Ece Elbirlik Ürkmez, İnci Holding Board Member and Ethics Committee President and Atty. Okan Demirkan, TEID Board Member. We had a participation of many attendees to the event from different companies. TEID aims to raise awareness on diversity management and will organize several other events around this theme.

Details from the event can be found [here](#).

TEID has also decided to prioritize the topic of inclusiveness and inclusion by forming a working group.

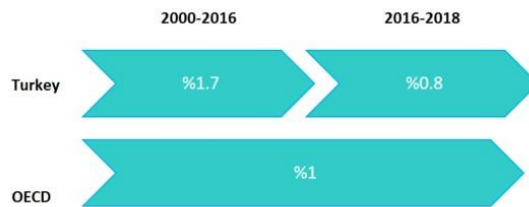


## “Tomorrow’s Ethical Leaders” Project

As Ethics and Reputation Society (TEİD), besides focusing on business ethics, creating and sustaining ethical society culture is one of our most important objectives.

If we look at Turkey's labor force, it is around 30.5 million people, which makes Turkey the 3rd largest labor force market in Europe. Young population is an important contributor to labor force growth and has boosted the country's rank over its competitors. Turkey has posted the largest labor force growth in relation to EU countries.

### Annual Average Increase in Labor Productivity (%)



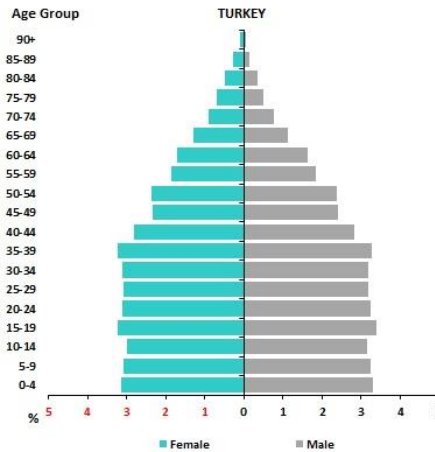
The growth in the number of universities has allowed Turkey to graduate a larger number of students, which in turn, has enabled Turkey to transform its young population and large labor force into a skilled workforce.

Turkey's characteristics:

- More than 6.7 million students are enrolled in tertiary education

- Approximately 800,000 students graduate from universities every year
- World-class engineering education

Turkey, with half of its population under the age of 31 in 2016, has the largest youth population when compared with countries in the EU. In the past decade, Turkey's age-dependency ratio has continued its downward trend.



Source: OECD, World Bank, [ISPAT](#), TurkStat

With **“Tomorrow’s Ethical Leaders”** project, TEİD is aiming youth to increase awareness on ethical values and to incorporate those values before entering the labor market. The earlier youth get aware and adopt ethical values, the more they will tend to take ethical decisions as individuals, as future parents, as employees, as managers and leaders.

TEİD’s focus on youth has started in 2014 with Mustafa Saffet Anatolian High School, which later became the very first public high school with an ethical code in Turkey.

What brought us together was the students’ research, in order to improve their fictive Entrepreneurship Club companies. They had discovered that, in order to make their business sustainable, they should adopt an ethical management. While searching a reference institution to be guided on this matter, they realized that most of the Turkish leading companies were TEİD corporate members, so they have contacted TEİD and have started to work together since then. Once we had a general information session on business ethics, students prepared their club companies code of ethics. As they understood the importance of these values, they decided to adopt the same approach for their school itself.

This very first experience has also been a prototype which guided us to create the roadmap of our project with the **“Today’s Youth is Tomorrow’s Leaders”** motto. **Our aim is to increase the awareness of ethics by the young generation and contribute to the raise of responsible individuals and leaders for the future.**

The main objective of the project is to **create a behavioral change of the young generation** so that their ethical decision mechanism functions as a natural will. This is only possible by internalization of the ethical values.

Parallel to that objective, students create an ethics committee with the elected representatives. They revealed their own ethical values during a first “Ethical Values

Workshop” where the attendance was only limited to the students and TEİD representatives in order to break the hierarchical chain between the students and administration/teachers. The refined values were gathered under the title “Code of Ethics” and announced/promoted within the school.

The adventure of MSAL (Mustafa Saffet Anadolu Lisesi) continues with the creation of a hotline within their school as a next step to the code of ethics and an ethics committee.

On the other hand, recognizing the ethical problems, resolving those problems and finding a communication strategy, award mechanisms and all kind of similar subjects were released to the students’ choices, goodwill and imagination.

### ***Ethics Summit For High School Students ([ZirvEtik](#))***

In 2018, for the first time, TEİD, in collaboration with Ethics and Entrepreneurship clubs’ students, organized a “**Next Gen Ethics Summit**”, based on the same model of TEİD’s yearly business-oriented International Ethics Summit since 2011.

As students were aware of the importance of the ethics-based business, their ambition was to combine the entrepreneurship with ethics and disseminate this perspective to the future’s business people. TEİD also had the opportunity to promote the profession of “Ethics and Compliance Manager” as a brand new and niche branch for the youth about to make their crucial decisions for professional life.

The event had taken place at [Okan University’s](#) premises, on April the 28<sup>th</sup>, 2018. The participants have received a participation certificate. As a first ever event, we have reached an attendance up to 150 students, which can be considered as a wide outreach for a prototype event.

TEİD aims to collaborate not only with public schools but also with private schools to use their material advantages to level up the overall educational platform in Turkey. TEİD adopts a parallel vision and mission to other projects; to level up the overall ethical country culture by using the force of the private sector and to level up the youth, by using the knowledge and opportunities of the private schools as well as speakers/trainers from the business world who will be right role models for the future generation.

Starting with this very first successful event, ZirvEtik now takes a part of TEİD’s annual events. This is why the premises of a private University is used and a teacher from a private school was making part of the event. The summit is held under the main theme: “Honest Success, Real Existence”.

Details of the first Ethics Summit for Youth can be found below:

**ETİK ve GİRİŞİMCİLİK ZİRVESİ  
GÜN AKIŞI**

**SERVİS KALKIŞI : 08.30**  
**KAYIT: 09.30-10.00**

**AÇILIŞ KONUŞMALARİ: 10.00-10.15**  
Cansu KIZILKAYA - Ali Cem GÜLMEN: Etik ve İtibar Derneği Ekibi  
Kübra Nur ARAS: Mustafa Saffet Anadolu Lisesi Öğrencisi

**"ETİK NEDİR?": 10.15-11.00**  
Tayfun ZAMAN: TEİD Yönetim Kurulu Üyesi

**"SIFIR'DAN BİR'E ETİK BİR YOLCULUK": 11.00-12.00**  
Erdem Mümtaz HACİPAŞAĞLU: Genç Girişimci – Startup Hukuku

**ÖĞLE ARASI: 12.00-13.00**

**PANEL- "DÜRÜST BAŞARI GERÇEK VAROLUŞ": 13.00-13.40**  
Damla CIRCIR : Panel Moderatörü ( Mustafa Saffet Anadolu Lisesi Öğrencisi)  
Ali Servet EYUPOĞLU: Mekanist - English Ninjas Kurucusu  
Cansu DENGEY: Influencer

**"ETİK VE SANAT İLE BAŞARIYA YÜRÜMEK" 13.40-14.40**  
Cuneyt DOĞANKUŞ: Özel Sezin Okulu Sahne Sanatları Bölüm Başkanı

**KAHVE MOLASI: 14.40-15.00**

**SÖYLEŞİ: 15.00-16.00**  
Coşkun ARAL: Belgesel Film Yapımcısı – Fotoğrafçı

**"TÜRKİYE'DE VE DÜNYADA SOSYAL GİRİŞİMCİLİK" 16.00-17.00**  
Doç.Dr. Ezgi YILDIRIM SAATÇİ: Okan Üniversitesi Öğretim Üyesi

**SERVİS KALKIŞI: 17.30**

MSAL MUSTAFA SAFFET ANADOLU LİSESİ  
TEİD Etik ve İtibar Derneği  
OKAN ÜNİVERSİTESİ

### Sessions / Speakers:

- What is Ethics?, Tayfun Zaman, TEİD Board Member, Reanda Turkey Head of Compliance
- An Ethical Journey From 0 to 1, Erdem Mümtaz Hacipasaoglu, Young Entrepreneur, Start-up Law
- Panel: "Honest Success, Real Existence", Graduates of MSAL, Cansu Dengey, Influencer and Ali Servet Eyuboglu, Founder of Mekanist and English Ninjas
- Walking Through Success With Ethics and Art, Cuneyt Dogankus, Sezin Private School Head of Performing Arts
- An Exchange with Coskun Aral, International War Photographer, Documentarist and Journalist

In this context, a wide framework of ethics, an overview from business world to educational and social world was presented to the attendees from multiple aspects and in interaction with them. Details can be found [here](#).



In 2019, TEİD has continued its contributions to Mustafa Saffet High School and have also added other high schools to its program. An art high school has joined the project, students have developed their scholar ethical values and have also discussed about ethics in arts. They also have organized an exhibition on June 2019, under the premises of Tekfen Holding, a TEİD corporate member willing to support them.



Another initiative has also been possible with the participation of The Sezin School. With the participation of Private German, Private Alev Schools, Üsküdar American High School, İELEV High School, Sezin Schools, Güç Kardeşler Anadolu High School and Daruşşafaka High Schools students, we have organized an Ethics Summit during which several topics (ethics in food, in education, in artificial intelligence, in social responsibility, in arts, in media, in sports and in business life) have been discussed and manifests have been presented to all attendees at the end of the event on April 9<sup>th</sup>, 2019. Around 250 students attended the event.



TEİD also works in association with universities to advocate for the profession. Several meetings with university students were organized in order to promote the Ethics and Compliance Profession in law and economy faculties of İstanbul, Marmara and Bilgi Universities. Those events aim to promote the profession and also aim to disseminate the importance of the profession.





## Annex 1 – TEİD Declaration of Integrity

