The Anti-Bribery and Anti-Corruption Review

Third Edition

Editor
Mark F Mendelsohn

Law Business Research

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Chapter 22

TURKEY

Orçun Çetinkaya, Filiz Toprak Esin and Bensu Aydın[1]

I INTRODUCTION

Anti-bribery and anti-corruption, although not yet strongly differentiated from one another in Turkey, have been a very hot topic in recent times. Society, lawmakers and the judiciary have taken a staunch approach against bribery in their own ways.

Society has raised its voice against bribery and corruption where possible as it regards bribery and corruption as an obstacle to the target of reaching the economic level of developed countries.

Because of internal pressure as well as international pressure to ensure that measures, particularly against bribery, meet international standards, lawmakers have broadened the out-of-date definition of bribery in an attempt to establish a greater deterrent and an internationally recognised measure against bribery. As to corruption, the new Turkish Commercial Code has introduced several measures, though some consider these not to be concrete enough.

The judiciary has also taken steps, especially against bribery, and these were taken even before the description of bribery in the Turkish Criminal Code was extended. Prosecutors in Turkey have increasingly been intervening in a wide range of issues of a commercial nature relating to alleged fraud and bribery, at times going to surprising extremes as they have tended to keep their distance from these issues in the past. Concerning the fight against bribery and corruption, therefore, Turkey has been undergoing a transformation in respect of not only the laws in place, but also the effective and proper application and enforcement thereof, as well as levels of awareness and the public reaction.

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II DOMESTIC BRIBERY: LEGAL FRAMEWORK

Domestic bribery and its elements have been described in Article 252 of the Turkish Criminal Code No. 5237 dated 26 September 2004 (TCC). Article 252 has been amended by Law No. 6352 published in the Official Gazette No. 28344 and dated 5 July 2012.

Prior to the amendment, where a public official receives a benefit to perform or not to perform a task that is in compliance with his or her requisite duties, this act would be deemed as the offence of misuse of public duty, which is penalised by Article 257 of the TCC. In other words, only performing a task contrary to the official's requisite duties constituted the offence of bribery. In line with the former version of Article 252, the Court of Appeals in its various decisions stated that performing a task in compliance with the requisite duties constitutes the offence of misuse of public duty. This interpretation of the Court of Appeals is expected to change because of the recent amendment of Article 252.

The amendment revised the definition of bribery. Receiving or providing a benefit illegally secured directly or through an intermediary by a public official or another person appointed by a public official to perform, or not to perform, a task regarding the performance of the official's duties now results in bribery, unlike under the previous system.

While the scope of bribery has been widened by the amendment, the very nature of bribery has remained the same. Bribery is considered to be a reciprocal crime. This feature of the crime has two consequences. First, an agreement must be reached between the individual who bribes and the public official; and second, the public official is punished in the same manner as the individual who bribes.

Article 6/1(c) of the TCC defines the public official as 'any person selected or appointed to carry out public duty for a temporary or permanent period'. Public officials are subject to the Law on Civil Servants No. 657 dated 14 July 1965. Pursuant to Article 28 of the Law, public officials (civil servants) cannot be involved in commercial activities. In addition, they cannot receive gifts or gain benefits because of their official duty (Article 29). The Regulation on the Principles of Ethical Behaviour of the Public Officials provides a list of acceptable gifts and a list that sets outs gifts that are strictly forbidden (Article 15). Accordingly, *inter alia*, greeting, farewell or celebration gifts, scholarship, travel, complimentary accommodation and gift cheques received from persons that have a business, service or benefit relationship with the related institution; and gifts or any kind of goods, clothes, trappings or food given by persons who are benefiting from the services of these officials are within the scope of the prohibition. In light of the foregoing, providing gifts, travel expenses, meals, entertainment or facilitating payments to a public official are not permissible under Turkish law. In connection with the above, pursuant to the Law on Declaration of Property, Anti-Corruption and Anti-Bribery Law No. 3628 dated 04 May 1990, among others, leaders of political parties, real persons who are owners of newspapers, newspaper board members and civil servants shall submit a declaration of property and must hand in any gifts that exceed the total value of 10 months of the minimum wage. The offence is not limited to this definition of a public official. Equally, intermediaries, irrespective of whether they are public officials, would be regarded as offenders. Most importantly, this category includes

lawyers. Therefore, lawyers in Turkey are regarded as public officials in their dealings with third persons and institutions as well as legal entities.

Moreover, the amendment of Article 252 introduced private bribery to the Turkish legal system because Article 252/8 extends the offence of bribery to certain individuals who are not public officials. Accordingly, Article 252 applies to individuals acting on behalf of:

a professional organisations that are public institutions;
b companies that have been incorporated by the participation of public institutions or entities, or professional organisations that are public institutions;
c foundations that are engaged in activities within a body of public institutions or entities, or professional organisations that are public institutions;
d associations working for the public interest;
e cooperatives; and
f publicly held joint-stock companies.

For instance, in a scenario where a lawyer gives money to a CEO of a publicly held company on behalf of his or her client, he or she will be regarded as committing the offence of bribery.

As regards the penalty, the individual who bribes, including intermediaries, is sentenced to imprisonment ranging from four to 12 years. A public official is sanctioned in the same manner. Where the public official who receives the bribe is a judge, a notary public or a sworn financial consultant, the duration of the imprisonment is increased by one-third.

As Turkish law has the principle of personal liability under Article 20 of the TCC, which states that 'no punitive sanctions may be imposed for legal entities', legal entities can only be subject to security measures. In this case, a fine of up to 2 million lira can be imposed (Article 43/A of the Law of Misdemeanours) and the legal entity can have its business licence cancelled (Article 60 of the TCC).

III ENFORCEMENT: DOMESTIC BRIBERY

While the new definition of bribery in Article 252 of the TCC has not yet been tested by the Court of Appeals, it is certain that the implications thereof will be significant in respect of the case numbers and the numbers of individuals accused.

The crime of bribery has been a hot topic in recent years. Some well-known public figures have been accused of bribery either because of their important public duties or the official transactions in which they were involved, and these have drawn a considerable level of public attention.

While for a long time in Turkey bribery has been regarded as a form of sickness associated in one way or another with public services, and considered a fundamental obstacle to the improvement of these services, Turkish society has been increasingly making its concerns known regarding the need to tackle bribery, the level at which it should be tackled and the degree of effectiveness thereof.

The lawmakers and the judiciary have tried to respond to these concerns in their own ways. The lawmakers have widened the definition of bribery, as discussed above.

While the wider definition was, in a sense, a move to bring the legislative framework to an international level, it has also addressed public concern, as the previous legal grounds for the fight against bribery were ineffective and, therefore, far from being a deterrent. This was, according to some, because of the narrow definition of bribery in the TCC as well as its soft application.

Before the amendment was made to the definition of bribery in the TCC, public prosecutors ran a large number of investigations so as to respond to the social expectations in this respect. With the close cooperation of the police, prosecutors investigated public procurement and customs operations. These investigations have attracted a considerable degree of public attention. Because of these investigations, for example, more than 100 customs officials and brokers have been named as suspects and then accused as a result of the acceptance of indictments by the criminal courts.

The investigations shook customs practices in Turkey. The customs offices, customs brokers and import companies alike have put compliance programmes in place to avoid such occurrences. On the public procurement front, one of the biggest companies in the construction industry is alleged to have bribed public officials to win the tender for the construction of a sewage system in Istanbul. The investigation is still pending.

The mayor of the one of the biggest cities in Turkey was also suspended by the Ministry of the Interior following accusations of corruption. The investigation is still pending.

Apart from the above, in late December 2013, the Turkish government was rocked by the waves of corruption. The prosecution office alleged that bureaucrats, several prominent businessmen, a mayor in Istanbul and the sons of three ministers, committed bribery and were involved in corrupted practices. Additionally, it is alleged that with the help of his off-record connections with three ministers and several bureaucrats, a well-known Turkish businessman transferred funds and smuggled gold through a Turkish bank and by couriers to Iran. Ironically, however, 96 suspects in these investigations were released following a decision not to prosecute, and preventive measures imposed on them, such as the freezing of accounts, were dismissed.

IV FOREIGN BRIBERY: LEGAL FRAMEWORK

Under the amendment of July 2012, with regard to bribery of foreign public officials, the provision penalising the bribery of foreign public officials has also been amended and the scope of the definition of foreign public officials has been widened. According to the new provision, the following is deemed to constitute bribery of a foreign official: offering, promising or giving a benefit for the purposes of fulfilling a job, or not fulfilling a job, or gaining an unfair benefit (or preserving one), directly or through an intermediary as a result of international commercial transactions, to the following officials:

a officials who have been elected or appointed in a foreign country;

b officials working in international or supranational or foreign courts (such as judges or members of a jury);

c members of international or supranational parliaments;

d persons who perform a public duty for a foreign country including foreign public institutions;

e citizens or foreign arbitrators who are appointed to arbitrate in dispute resolution; and

f officials or representatives of international or supranational organisations that have been established by international treaties.

In addition to the above provision on the offence of foreign bribery, a new paragraph has been added to Article 252 that gives the power to initiate a prosecution *ex officio* against foreigners who bribe foreign officials outside Turkey in relation to a transaction in which Turkey, or a public institution located in Turkey, or a legal entity, established under Turkish laws, or a Turkish citizen, is involved. That being said, there was a contradiction in the TCC since it stipulated under Article 12 that the commencement of proceedings were subject to a request by the Ministry of Justice. With the latest judicial package, introduced in July 2014, this contradiction is resolved and the requirement for the request by the Ministry of Justice is lifted. Thus, foreigners who bribe foreign officials outside Turkey in relation to Turkish affairs are now subject to investigation and prosecution *ex officio*.

V ASSOCIATED OFFENCES: FINANCIAL RECORD KEEPING AND MONEY LAUNDERING

Under Turkish law, the type of books subject to the obligation for maintenance, the scope of the obligation and the liabilities that may arise in cases of non-compliance with such obligations are determined by various regulations, such as the Turkish Commercial Code No. 6102 (the Commercial Code), the Tax Procedure Code (TPC), the Bankruptcy and Enforcement Code and the Social Insurance and General Health Insurance Code (SIGHIC).

Pursuant to relevant provisions of the Commercial Code, all types of companies shall maintain an account book, inventory, ledger, shareholders' book, and a decision book wherein board of director decisions are recorded. Joint-stock companies are required to keep a shareholders' book, and, if they have issued bonds, a bond book as well.

If the company books and documents are lost because of disasters such as a fire, flood or earthquake, the Commercial Code regulates that the company shall apply to court within 15 days of the occurrence date of the incident and request an official document called a 'loss document', which confirms that the company was not negligent in relation to the loss of the books or documents.

Because under reasonable circumstances the Court of Appeals has traditionally accepted book and document theft as a valid reason for the issuance of a loss document, theft is included alongside other disasters in the new Turkish Commercial Code, which entered into force in July 2012.

As to the sanctions for record-keeping violations, pursuant to the Commercial Code, the TPC and the SIGHIC, various sanctions and fines can be imposed on those companies that do not keep books and documents for the stipulated periods of time, or fail to make them available to authorities for inspection. In a dispute, failure to submit books constitutes conclusive evidence against the company. Moreover, in a potential tax assessment, the company may face a tax penalty or might not be able to take advantage of its rightful VAT deductions.

Regarding criminal sanctions, according to the new Commercial Code, a judicial fine corresponding to up to 300 days[2] will be imposed against companies that do not comply with the book maintenance obligation, either by not obtaining company books approval; failing to duly maintain the company books; or failing to submit the documents when requested.

Unlike the accidental loss of documents, deliberate acts of document forgery might raise the suspicion of money laundering.

The Law on Prevention of Laundering Proceeds of Crime No. 5549 dated 11 October 2006 (Law No. 5549), the Regulation on Measures Regarding Prevention of Laundering Proceeds of Crime and Financing of Terrorism, the Regulation on Program of Compliance with Obligations of Anti-Money Laundering and Combating the Financing of Terrorism and communiqués issued by the Ministry of Finance on the implementation of measures taken by the Financial Crimes Investigation Board of the Ministry of Finance (MASAK) form the Turkish anti-money laundering legislation.

Article 282 of the TCC sets forth the legal basis of money laundering. Accordingly, any person who transfers the assets acquired from an offence that requires at least six months' imprisonment, or carries the same to a foreign country to be subject to various transactions to hide the illegal source of these assets and to give the impression that they are acquired in the lawful manner, shall be sentenced to imprisonment of between three and seven years, and shall also be liable to a punitive fine of up to 20,000 days.[3]

The regulatory body MASAK was established in 1996 with a special mandate to address corruption. It is empowered to collect data, request documents from relevant bodies, and, most importantly, convey the investigation files to the competent Public Prosecutor authorised to prosecute money laundering cases.

Finally, Law No. 5549 sets forth the principles for the prevention of money laundering. Among others, Law No. 5549 requires the disclosure of suspicious financial transactions. Those who operate in the fields of banking, insurance, individual pensions, capital markets, money lending and other financial services, and postal services and transportation, lotteries and bets; those who deal with exchange, real estate, precious stones and metals, jewellery, all kinds of transportation vehicles, construction machines, historical artefacts, artworks, antiques or intermediaries in these operations; and notaries, sports clubs and those operating in other fields determined by the Council of Ministers ('obliged party' as defined in Law No. 5549) are required to disclose suspicious transactions. Any information, suspicion or reasonable grounds to suspect that the asset that is subject to the transactions carried out or attempted to be carried out within or through the obliged parties, although not necessarily related to bribery conduct, is acquired through illegal ways or used for illegal purposes, must be disclosed to the presidency of MASAK.

2 The judicial fine, which is stipulated under Article 52 of the TCC, is calculated by multiplying the number of days with the monetary amount ruled by the court. This amount should be between 20 and 100 Turkish lira (approximately €7 and €35), depending on the economic and personal circumstances of the individual.

3 See footnote 2.

VI ENFORCEMENT: FOREIGN BRIBERY AND ASSOCIATED OFFENCES

As the 'Exporting Corruption: Progress Report 2013'[4] states, Turkey is one of the countries where anti-corruption rules have little enforcement; it is not possible, therefore, to cite many foreign bribery cases with a cross-border outlook.

It is known that investigations were initiated against three companies (i.e., a well-known tech darling, an innovative consumer and medical device company with more than 50 branches worldwide, and a reputable player in the safety and security sector), with the allegations that the Turkish subsidiaries of these companies have bribed Turkish government officials. However, all of these investigations were dropped by the prosecutors although other subsidiaries of these companies were convicted of bribery in other countries; which might be regarded as an objective indicator of the level of enforcement in Turkey.

In 2011, Turkey initiated a foreign bribery investigation against a Turkish company having a business relationship with the Oil-for-Food programme in Iraq, which is a programme started by the UN Security Council in 1996. On 20 September 2011, the Ankara Court concluded that the acts were committed prior to the act becoming a crime; eventually, the defendants were acquitted of the offence. A well-known corruption scandal in 2011 caused the Turkish Prime Ministry Inspection Board to initiate an investigation against the same company's Turkish subsidiaries in 2011. The investigation continues into the allegations that the company in question was involved in bribery in Turkey and Iraq from 1999 to 2007. Lastly, in April 2012, one of the largest mobile phone providers in Turkey initiated an internal investigation about allegations of 'improper payments' related to a mobile operator in Kazakhstan in which it has an indirect shareholding through its subsidiary.

VII INTERNATIONAL ORGANISATIONS AND AGREEMENTS

Turkey is signatory to several conventions, the most important of which are:

a the United Nations Convention against Corruption;
b the United Nations Convention against Transnational Organized Crime;
c the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
d the Council of Europe Criminal Law Convention on Corruption;
e the Council of Europe Civil Law Convention on Corruption; and
f the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism.

4 Transparency International, 'Exporting Corruption: Progress Report 2013: Assessing Enforcement of the OECD Convention on Combating Foreign Bribery', available at: http://files.transparency.org/content/download/683/2931/file/2013_ExportingCorruption_OECDProgressReport_EN.pdf.

In addition, Turkey has been a member of the Financial Action Task Force since 1991 and the Group of States against Corruption (GRECO) since 2004. In line with the suggestions of GRECO, the Turkish government recently adopted, in July 2014, the decision on the approval of the Additional Protocol to the Criminal Law Convention on Corruption as a law, which extends the scope of the Convention to arbitrators and jurors. Notably, this extension had already been implemented under the above-mentioned amendment of July 2012.

Furthermore, Turkey very recently became a member of the Agreement for the Establishment of the International Anti-Corruption Academy as an International Organization.

Advocates of anti-corruption practices see this membership as an indication of the Turkish government's commitment to fighting corruption.

VIII LEGISLATIVE DEVELOPMENTS

The strategy of the government on increasing transparency and strengthening the fight against corruption for 2010 to 2014 was published in Official Gazette No. 27501 dated 22 February 2010. This action plan provides a strategy for tackling corruption. Three main components of this strategy are: preventive measures, law enforcement measures and measures to raise awareness.[5] Similarly, the strategic plan of 2011–2015 published by the Turkish Prime Ministry in 2010, also focuses on anti-corruption measures.[6]

Within the scope of this action plan, *inter alia*, completing the ongoing work for the creation of ombudsmen, improving transparency of the financing of political parties and elections, finalising expected legislation about state secrets and trade secrets and revisiting the public procurement system are cited as the expected measures to be taken by the government.

Another legislative development regarding corruption is the amendments placed right after the investigations in 17 December 2013. On 6 February 2014, the fifth judicial reform package, which, among several amendments, included but was not limited to amendments to the Turkish Criminal Procedure Code No. 5271 (CPC), was passed as a law. These amendments focused on preventive measures that, among other things, relate to bribery and corruption-related crimes. The amendments are of great importance since the preventive measures take the form, in general, of sanctions for bribery and other corrupt practices. Pursuant to the amendments, confiscation as a preventive measure during criminal proceedings can only be conducted with the unanimous affirmative votes of three judges at the High Criminal Court. Under the former legislation, the judge of the Criminal Court of First Instance was able to take such measures. In addition, an administrative stage has been introduced for such a measure to be taken: for the High

5 Presentation by Yüksel Yilmaz, Deputy Head of the Prime Ministry Inspection Board, available in the OECD 'Anti-Corruption Policy and Integrity Training' report at www.oecd.org/dataoecd/3/17/47912383.pdf.

6 'The Strategic Plan of the Turkish Prime Ministry for 2011–2015', available at www.basbakanlik.gov.tr/handlers/filehandler.ashx?fileid=5947.

Criminal Court to take a measure of this nature it needs a report from a competent regulatory authority regarding the existence and value generated from the crime committed. Thus, to decide on a measure of confiscation, judges need to have a report from a competent authority (e.g., the Banking Regulation and Supervision Agency, the Capital Markets Board and MASAK), and ideally this report is to be submitted by the authority within three months.

While the efficiency, objectivity and reliability of this new confiscation system has been criticised, the amendments have also raised questions as to whether this report will be considered as an expert report or an administrative decision, since the mechanism used to raise an objection would depend on the nature of the report. Although the amendments may produce a period of ambiguity, they surely encourage the implementation of EU standards in general. It is hoped that these amendments will ultimately create a safer zone for corporations operating in Turkey, as they secure the conditions of confiscation.

Last but not least, with the latest judicial reform package accepted in July 2014 (see Section IV, *supra*), two new amendments to the TCC have been implemented. With the amendments, the precondition of the request by the Ministry of Justice (Article 12 of the TCC) was abolished (see Section IV, *supra*), and Article 277 of the Criminal Code, which regulates the crime of intervening in a judicial process, was amended in such a way that any intervention during an investigation phase will no longer be a crime.

IX OTHER LAWS AFFECTING THE RESPONSE TO CORRUPTION

The TCC remains the main regulation affecting the response to corruption and bribery. As the name suggests, however, the TCC is the general law for all types of crime.

This is why in the TCC there are only some provisions allocated to corruption and bribery. It has been mentioned that a special law dealing only with corruption and bribery would have suited the needs of the matter and been a more effective measure against such acts. Because of the scope that needs to be covered by the TCC, corruption and bribery provisions have found only a minor place in the law, which results in ineffective application and enforcement of those clauses as the definition, variations and penalties of those crimes are squeezed into those limited provisions. Even though there is some secondary legislation such as the Law on Declaration of Assets and Combat against Bribery and Corruption, a special law focusing on corruption and bribery would be a positive development.

On the other hand, there are a large number of provisions in various laws, such as the Commercial Code, the Customs Law, the Smuggling Law and the Tender Law, dealing with corruption in one way or another. However, as there is no umbrella law under which all those laws and regulations concerning corruption and bribery are mentioned or systematised, it might be insufficient to mention some of those laws affecting the response to corruption and not mention the others.

One law that should be mentioned, however, is the Customs Law No. 4458. The Customs Law and its Regulation, as well as secondary communiqués issued according to those, focus on corruption heavily although the terminology used differs at times from 'corruption' or 'bribery'. It is understandable that the Customs Law should be

the law that deals seriously with corruption, as importers, whether real persons or legal entities, are always interacting with customs officers to complete their transactions.

X COMPLIANCE

The terms 'compliance' and 'compliance programme' have been more commonly used in practice as a result of the increase in international investment in Turkey. In particular, the strong presence of US and UK-based companies in business life entails an increase in the general awareness of business people regarding anti-corruption, international trade and money laundering rules, and trade restrictions, etc.

There is no specific law describing the basics of a compliance programme focused on bribery, nor does any guidance published by an official body exist. However, there is the Regulation on Program of Compliance with Obligations of Anti-Money Laundering and Combating the Financing of Terrorism (the Regulation on Program of Compliance) based on Law No. 5549 on Prevention of Laundering Proceeds of Crime.[7] This Regulation is only binding for banks, capital markets brokerage houses, insurance and pension companies, the general directorate of post pertaining only to banking activities, and their broad agencies, representatives, commercial representatives and similar affiliated entities. This Law and Regulation provide scope for a compliance programme that must be established using a risk-based approach. According to Article 5 of the Regulation on Program of Compliance, a proper compliance programme shall be appropriate for developing institutional policy and procedures, carrying out monitoring and controlling activities, assigning a compliance officer and establishing the compliance unit, carrying out training activities and internal control activities. This legislation can be considered as guidance by companies who would like to enforce an effective compliance programme.

In the Turkish jurisdiction, having a compliance programme in force is not accepted as a solid defence against the risk of criminal investigation or sanction. From a legal point of view, however, because Turkish criminal law requires wilful intention to commit bribery, having a compliance programme can serve as part of an accused company's full defence strategy to demonstrate that neither the company nor its representatives had any intention to commit a crime nor instructed its employees in such a way as to direct them to give a bribe. In particular, the compliance programme can be shown as evidence of proper and clear instructions on business principles, and serve to demonstrate that to act as an authorised representative of the company would preclude involvement in a case of bribery or corruption. On the other hand, this may not be accepted as an adequate defence for the company against the risk presented by the measure stipulated under Article 60 of the TCC if the bribery in question would potentially produce a beneficial outcome for the company. But it certainly may be considered as a mitigating factor to decrease the level of sanctions.

Another benefit of the corporate compliance programme as a defence tool is that it may be used by the company to demonstrate that the employee who was involved in bribery had clear instructions and rules on the correct procedures to follow in performing

7 Legal texts can be found at www.masak.gov.tr/en/legislation.

his or her duties. Breaching the company's business rules – even in cases where there is an instruction by a higher-positioned employee – can be used as evidence of wilful intention to commit a crime, and can be a reason for rightful termination of the employment contract without waiting for the result of the relevant investigation or trial.

XI OUTLOOK AND CONCLUSIONS

Turkey is undergoing a kind of transformation process in the way it regards corruption and bribery, as well as the way in which it takes action against these acts. Turkish society is becoming more aware of and interested in the fight against corruption, and it no longer takes corrupt systems lightly. In response to these concerns, the legislator broadened the scope of bribery with the amendment to Article 252. Consequently, Turkey may expect less criticism from international bodies and advocates of anti-corruption activities in that regard.

A special law dealing only with this subject in detail would also help to increase the level of effectiveness of actions against corruption and bribery. There have been discussions in some circles where practitioners and scholars discuss and press for such a law; the outcome of such discussions remains to be seen.

Prosecutors' increased intervention in commercial issues involving allegations of corruption and bribery is a new trend; that this intervention seems to have taken the place of intervention in relation to people or issues only having political or significant public interest one way or another is causing concerns among practitioners and scholars.

Appendix 1

ABOUT THE AUTHORS

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Orçun Çetinkaya is a partner at Gün + Partners. He has represented local and multinational companies in complex fraud, bribery, corruption and tax cases, and advised his clients in relation to anti-corruption schemes and procedures. He has guided his clients regarding local implications and applications of the FCPA and UK Bribery Act and given training in that respect. He holds an LLB degree from the University of Ankara and an LLM degree from the University of Nottingham. He is a member of European Criminal Bar Association, LCIA, IBA and ABA.

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