

## University Anti-Bribery and Corruption Policy

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### 1. Purpose

This policy establishes the University's commitment to preventing, detecting, and responding to all forms of bribery and corruption. It sets out clear principles and responsibilities to ensure that all university operations are conducted ethically, transparently, and in compliance with national laws and international standards.

### 2. Scope

This policy applies to all members of the university community, including:

- Staff, faculty, administrators, board members, and researchers.
- Students, alumni representatives, and student unions.
- Contractors, consultants, vendors, donors, and partner institutions.
- Any person acting on behalf of the university in any capacity.

### 3. Policy Statement

The University maintains a **zero-tolerance** approach to bribery and corruption in all its forms. Bribery, facilitation payments, kickbacks, and any form of unethical inducement or reward intended to influence decision-making are strictly prohibited.

The university is committed to:

- Promoting a culture of integrity, fairness, and transparency.
- Ensuring all decisions are merit-based and free from undue influence.

- Complying with local anti-corruption laws and international frameworks (e.g., UN Convention against Corruption, OECD Guidelines, ESG Governance Pillar).
- Regularly assessing risks and implementing strong internal controls.

#### **4. Definitions**

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to improperly influence decisions or actions.
- **Corruption:** Abuse of entrusted power for private gain, including fraud, nepotism, collusion, and embezzlement.
- **Facilitation Payments:** Small, unofficial payments made to expedite routine administrative processes.
- **Kickbacks:** A return of a portion of money already paid, as part of a corrupt arrangement.

#### **5. Prohibited Conduct**

University personnel and affiliates must not:

- Offer or accept bribes, gifts, or hospitality in exchange for favorable treatment.
- Use university funds or resources for illegal or unethical purposes.
- Provide facilitation payments to government officials.
- Conceal or misrepresent financial transactions.

#### **6. Due Diligence and Risk Management**

- Conduct background checks and ethical due diligence on all major partners, vendors, and third-party contractors.
- Implement anti-bribery clauses in all major contracts and MoUs.
- Maintain robust procurement, finance, and audit systems to detect and prevent irregularities.

#### **7. Gifts, Hospitality, and Donations**

- Modest and culturally appropriate gifts may be accepted or given only if they:
  - Are of nominal value.
  - Do not create a sense of obligation.
  - Are transparently reported and recorded.

- All gifts, entertainment, or charitable contributions must be approved by the designated compliance office.

## **8. Training and Awareness**

- Mandatory anti-corruption and ethics training for all staff, faculty, and governing board members.
- Awareness campaigns for students and student organizations.
- Inclusion of anti-bribery content in staff onboarding and student orientations.

## **9. Reporting and Whistleblowing**

- A secure and confidential **Whistleblower Hotline** or reporting mechanism shall be established.
- All university stakeholders are encouraged to report suspected corruption, fraud, or misconduct.
- Whistleblowers are protected against retaliation and victimization in accordance with the university's Whistleblower Protection Policy.

## **10. Monitoring, Investigation, and Disciplinary Action**

- The **Internal Audit or Ethics Office** shall monitor compliance and investigate all reports of bribery or corruption.
- Proven violations will result in appropriate disciplinary action, including termination of employment, contracts, and possible legal proceedings.
- An annual anti-bribery risk report shall be submitted to university leadership and relevant authorities if required.

## **11. Alignment with Global Standards**

This policy is aligned with:

- UN Convention against Corruption
- OECD Anti-Bribery Convention
- UN SDG 16 – Peace, Justice and Strong Institutions
- ISO 37001 Anti-Bribery Management System
- ESG Governance Principles
- National anti-corruption and penal codes

