

Anti-Bribery Policy

Introduction

The University is committed to ensuring adherence to the highest legal and ethical standards. This must be reflected in every aspect of the way in which we operate. We must bring integrity to all our dealings. Bribery and corruption harms the societies in which these acts are committed and prevents economic growth and development. This is not just a cultural commitment on the part of the University; it is an ethical issue and a legal requirement. Bribery is a criminal offence, and corrupt acts expose the University and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the University's reputation.

This policy has been adopted by the University and is to be communicated to everyone involved in our business to ensure their commitment to it. The University attaches the utmost importance to this policy and will apply a "zero tolerance" approach to acts of bribery and corruption by any of our employees or by any partners working on our behalf. Any breach of this policy will be regarded as a serious matter by the University and is likely to result in disciplinary action.

Policy Statement

The University's aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-corruption policy, disseminated internally and to external partners;
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging all employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Establishing processes to review corruption risks affecting University business;
- Setting out clear policies on gifts, hospitality, and donations;
- Due diligence on contracts with third parties;
- Review of the University's financial and other commercial controls;
- Monitoring compliance;
- Taking firm and vigorous action against any individual(s) involved in bribery;
- Ensuring that adequate procedures are embedded and transparent.

The University prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on behalf of the University in order to gain any commercial, contractual or regulatory advantage for the University in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Responsibility and Reporting

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the University. Suitable channels of communication by which employees or others can report, confidentially, any suspicion of bribery will be maintained via the University's fraud response and whistle-blowing policies.

(July 2011)

Approved by University Council 5 July 2011