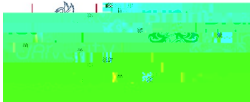


1.1. It is the policy of the University that all staff and students conduct business in an honest way, and



auditable. The University expects our business partners, agents, suppliers and contractors to act with integrity and to avoid any actions that may be considered any offence within the meaning of the Bribery Act 2010.

- 5.1. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- 5.2. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- 5.3. Bribery is not limited to the act of offering a bribe. If an individual accepts a bribe, they are also breaking the law.
- 5.4. Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). In particular employees must not bribe any foreign public officials anywhere in the world.
- 5.5. If employees are uncertain about whether something is, a bribe or a gift or act of hospitality, they must seek further advice from the Secretary to Council or the Head of Legal Services.

· 0 · 0 ) 1 ( 0 · 0

- 6.1. This section of the policy refers to 4 areas:
  - a) Gifts and Hospitality.
  - b) Facilitation payments.
  - c)

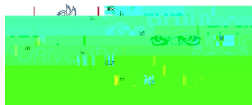




facilitation payments



- Line Manager
-



- 8.4.4. If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your Line Manager immediately.
- 9.1. The University will provide training on this policy to all staff as part of its mandatory training. Furthermore the University will provide relevant anti-bribery and corruption training to staff etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all organisations should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.
- 9.2. The University's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.
- 10.1. The University will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. The University will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.
- 11.1. The Secretary to Council's responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis, and will assess its suitability, adequacy, and effectiveness.
- 11.2. This policy will be reviewed by the Audit Committee annually, or as and when any legislative changes occur, to ensure compliance with the principles of the act. Council will be advised of any action taken via the Annual Report from the Audit Committee.
- 11.3. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- 11.4. Employees may raise concerns at any time to the Secretary to Council or by using the University's then-current whistleblowing procedures.

Document author:	Secretary to Council
Document approver:	Audit Committee
Last updated:	September 2019

