

Al-Taqwa University
Anti-Bribery & Corruption Policy

1. Introduction

It is the policy of Al-Taqwa University that all staff and students conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

This is not just a cultural commitment on the part of the University; bribery is a criminal offence in most countries 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 Council and Council requires it to be communicated to everyone involved in our organisation to ensure their commitment to it.

2. What is Bribery and Corruption?

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract. Corruption is the misuse of public office or power for private gain, or misuse of private power in relation to business outside the realm of government.

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. The person being bribed is generally someone who will be able to obtain, retain or direct business. This may involve initiatives such as buying or selling, or it may involve the handling of administrative tasks such as licences, customs, visas or taxes. It does not matter whether the act of bribery is committed before or after the activity has been undertaken.

Who can engage in Bribery or Corruption?

In the eyes of the law, bribery and corrupt behaviour can be committed by:

- An employee, officer or director.
- Any person acting on behalf of the University (agents or third-party representatives which sometimes include students).
- Individuals and organisations which authorise someone else to carry out these acts.

Accurate Books and Record-Keeping

Many serious bribery and corruption offences have been found to involve some degree of inaccurate record-keeping. Accurate records and financial reporting must be maintained for all activities and for all third-party representatives acting on our behalf. False, misleading, or inaccurate records of any kind could potentially damage the reputation of the University.

Effective monitoring and Internal Control

Effective systems of monitoring and control are essential in all organisations and the University is no exception. Once bribery and corruption risks have been identified and highlighted, we may need to amend procedures to help mitigate these risks on an on-going basis.

Gifts, Entertainment and Hospitality

Gifts, entertainment, and hospitality include the receipt or offer of gifts, meals or tokens of appreciation or gratitude, or invitations to events, functions, or other social gatherings, in matters connected with our university. These activities are acceptable provided they fall within

reasonable bounds of value and occurrence. The University Policy on Gifts and Hospitality sets out the limits approved by UEB, and the process required to record gifts and hospitality.

How to raise a concern

As individuals who work on behalf of the University, we all have a responsibility to help detect, prevent, and report instances not only of bribery but also of any other suspicious activity or wrongdoing. The Al-Taqwa University is absolutely committed to ensuring that all staff have a safe, reliable, and confidential way of reporting suspicious activity. The University wants each

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and every one to know how they can 'speak up'. If you are concerned that a corrupt act is being considered or carried out, you should report the matter to your line manager.

Giving and accepting Gifts and hospitality

When evaluating what is acceptable, first take a step back and consider:

- What is the intent – is it to build a relationship or is it something else?
- How would this look if these details were on the front of a newspaper?

If you find it difficult to answer one or more of the above questions, there may be a risk involved which could potentially damage the reputation of University. The action could be unlawful.

THE END OF POLICY