

**ANTI- BRIBERY AND
ANTI- CORRUPTION
POLICY**

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

GD Goenka University is committed to conducting all its activities with the highest ethical standards and fostering a culture of integrity. This policy outlines the University's zero-tolerance approach to all forms of bribery and corruption whether committed directly or indirectly by any employee, student, or agent acting on behalf of the university.

1. Short Title, Application and Commencement

- This policy shall be known as the “Anti-Bribery and Anti-Corruption Policy.
- This Policy applies to all members of the University community, including faculty, staff, research scholars, students, and third-party vendors.

2. Objectives

- Implementing and maintaining effective systems to prevent bribery and corruption.
- Acting professionally, fairly, and with integrity in all academic and non-academic activities.
- Providing clear guidance and training to all members of the University community on their anti-bribery and anti-corruption obligations.
- Investigate any allegations of bribery or corruption promptly and thoroughly.
- Taking appropriate disciplinary action against those who engage in bribery or corruption.

3. Definition

In this policy, unless the context otherwise requires:

- “Bribery” refers to offering, promising, giving, or accepting anything of value to influence a decision or action.
- “Corruption” means the abuse of entrusted power for private gain.

4. Prohibited Activities Actions that may be attributed to Harassment or Victimization

- Offering or accepting bribes in any form, including cash, gifts, hospitality, or favours.
- Engaging in any form of favouritism or nepotism.
- Misusing University funds or resources for personal gain.
- Failing to disclose conflicts of interest.
- Tampering with academic records or research data.
- Making unauthorized payments or gifts to third-party vendors

5. Responsibility and Consequences of Non-Compliance

The policy acts as a source of information and guidance for those working for the University and helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities. The University community is bound by the laws of India, including the related Acts of Bribery and corruption. All members of the university fraternity, students, and third-party vendors are expected to comply with this policy.

- The University encourages all members of the community to report any suspected incidents of bribery or corruption to Deans/ HoD or the Registrar's office.
- The concerned personnel will investigate all reported incidents promptly and thoroughly.
- The report will then be submitted to the Vice-Chancellor for further action.
- Individuals who report bribery or corruption in good faith will be protected from retaliation/detrimental treatment

6. Disciplinary Action

Individuals found guilty of violating this policy will be subject to disciplinary action, which may include dismissal, termination of contracts, or legal proceedings. The Vice-chancellor of the university will be responsible for approving any actions taken with regard to bribery and corruption on campus.

7. Monitoring and Review

The university will provide regular training and awareness programs to employees, students, and relevant stakeholders on their anti-bribery and anti-corruption obligations.

The policy is periodically reviewed and communicated to everyone to ensure their commitment to maintaining a corruption-free environment. Breaching the policy will result in disciplinary action.

8. Record Keeping

The University is careful when dealing with third parties by conducting risk assessments, and background checks, and ensuring adherence to anti-bribery and corruption standards.

- The University keeps accurate financial records and has internal controls in place for evidence of all payments made. It documents and declares the reason and amount of gifts or hospitality given or received, subject to management review.
- Payments made to third parties must always have a legitimate business reason, and such reason should be recorded.
- Expense claims for gifts, hospitality, entertainment, or third-party expenses must comply with the relevant policy and include a specific reason for the expenditure.