



Anti-Bribery & Corruption Policy

Approved by University Council, January 2025
To be reviewed no later than (January 2030)

Anti-Bribery & Corruption Policy

Statement of Policy

ECU is committed to operating in an ethical manner and in compliance with applicable anti-bribery laws and regulations in Egypt. ECU's policy prohibits the direct or indirect giving or receiving of improper payments or other benefits for the purpose of obtaining an advantage. More specifically, members of the University community may not directly or indirectly make, promise, approve, authorize, or offer to give anything of value to anyone with the intent of improperly inducing the recipient to take action that would benefit ECU or another party.

Definitions

Bribery is defined as giving or getting anything from another person (typically money, a present, a loan, a reward, a favor, a commission, or entertainment) as an improper incentive or reward in exchange for business, employment, or any other benefit. Bribes could include:

1. Presents, excessive entertainment, hospitality, travel, and hotel expenses.
2. Payments made by employees or partners, including recruiters, labor service providers, and consultants; and,
3. Other 'favors' given to supervisors, such as making unexpected advances, payments, or promises.

Purpose of this Policy

The purpose of this policy is to ensure that members of the University Community conduct University business ethically while also understanding and adhering to all applicable anti-bribery laws and best practices.

Scope of this Policy

This policy applies to:

All associated with ECU including staff, students, affiliates, visitors and any other third parties.

Engaging Third Parties

ECU may be held responsible for the actions of third parties acting for or on its behalf. As a result, Third Parties may not engage in activities that a University Community member may not engage in while acting for or on behalf of ECU. To reduce the risk of potential liability arising from the actions of others, a Third Party may only be engaged

after the department, Faculty, or unit engaging the Third Party on ECU's behalf conducts due diligence to ensure that the Third Party is reputable and committed to operating in an ethical and legally compliant manner. This policy will be communicated to Third Parties as appropriate based on an assessment of risk, and appropriate contractual arrangements will be implemented to ensure compliance by such Third Parties.

Compliance Training

To promote this policy, members of the University Community, including but not limited to Senior Administrators, staff in Procurement, University Development and Alumni Relations, Office of Global Programs, and Office of Sponsored Programs, as well as other staff who may interact with Public Officials or Third Parties while performing University activities (e.g., researchers and faculty members), will receive periodic compliance training. ECU will offer appropriate educational and training programs and resources.

Accounting Books and Records

Compliance with ECU's accounting and internal control procedures, including, but not limited to, ECU's Business Expenses Policy, Expense Reimbursement Policy, Petty Cash Funds Policy, Purchasing Policies and Procedures Manual, and Sponsored Programs Administration Post-Award Handbook, is mandatory to ensure that all accounting records, payments by or on behalf of ECU, expenditures, expense reports, invoices, vouchers, gifts, and any other business expenses are accurately False or misleading entries and invoices are strictly prohibited. Maintaining accurate books and records and adequate internal accounting controls is required by many anti-bribery laws, as well as an international best practice for preventing improper behavior.

Reporting

Members of the University Community are encouraged to report any suspected or actual violations of this policy or anti-bribery laws.

Consequences of Violation

Any member of the University Community who violates this policy may face disciplinary action, including dismissal or expulsion, as appropriate. Third parties who violate this policy face the termination of all relationships with ECU. Individuals who violate this policy may face both civil and criminal penalties.