



**ANTI-
CORRUPTION &
ANTI-BRIBERY
POLICY**



It is the policy of Brainware University to conduct all of its activities in an honest and ethical manner. University takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its tasks and relationships, and to implement and enforce effective systems to counter bribery. This includes a prohibition against both direct bribery and indirect bribery, including payments through third parties. If any associate suspects or becomes aware of any potential bribery involving any employee, it is their moral duty to invite the attention of the higher authorities of the University.

Definitions

- Bribery means to obtain or accept or attempt to obtain or promise for giving, receiving, soliciting or accepting of financial or other advantages, or any other thing of value, to influence or reward the behaviour of a person who is in a position of trust to perform a public, commercial or legal function to retain or obtain a commercial advantage.
- Corruption is dishonest, improper and usually unlawful conduct intended to secure a benefit undertaken by a person or organization entrusted with authority to attain illicit benefit or abuse power for one's private gain.
- Facilitation payments are unofficial payments made to secure or expedite a routine action by authorized official.
- Gift means any item of considerable value, given to/received from a party that has business dealings with the organization.

2. OBJECTIVE

The purpose of this policy is to:

- a) set out our responsibilities to comply with laws against bribery and corruption; and
- b) provide guidance on how to recognise and deal with bribery and corruption issues.

3. SCOPE

- Sponsorships used to secure advantage in business transactions.
- Facilitation payments made to secure or accelerate routine or necessary business actions.
- Gifts, hospitality and expenses payments made to secure advantage in business transactions.

The purpose of this policy is to:

- a) set out our responsibilities to comply with laws against bribery and corruption; and
- b) provide guidance on how to recognise and deal with bribery and corruption issues. BWU will undertake a periodic bribery and corruption risk assessment across its business to understand the bribery and corruption risks it faces and ensure that it has adequate procedures in place to address those risks. The risk assessment will be documented and periodically reviewed

This policy applies to all dealings, transactions, and expenses for and on behalf of BWU. This policy applies to all stakeholders working for the University.