

<b>Policy Title:</b>	<b>10.b Anti-Corruption and Bribery Policy</b>		
<b>Policy Number:</b>	PD-PO-10B	<b>Date Created:</b>	15-02-2023
<b>Responsible:</b>	Registrar Vice President Student Affairs	<b>Approved by:</b>	Board of Trustees

### Purpose

Canadian University Dubai is committed to conducting all of its activities in an open, honest, transparent and ethical manner. CUD maintains a zero-tolerance policy towards corruption and bribery in all its forms.

CUD is also committed to follow all relevant Anti-Corruption and Bribery laws in the UAE and will report any suspected incidents of law-breaking in these areas to the relevant authorities.

This policy aims to promote a culture of honesty and integrity.

This policy also provides guidance for those working at the university regarding the ethical norms and standards of the university, how to recognize when those norms and standards are being violated, and guidance regarding how to report such violations.

### Scope

This policy applies to CUD management, faculty and staff.

### Policy Statement

#### What is Bribery and Corruption?

##### Bribery

Bribery is the offer or promise or demand for an advantage, financial or otherwise, to induce an individual to commit an action which is illegal, unethical or a breach of trust. It may include an offer of money or other benefit to induce an individual to ignore university policies to confer an advantage inappropriately upon another. Acts of bribery typically are designed to induce an individual to perform their duties dishonestly. There is typically a “quid pro quo” in a bribery transaction; both sides receive a benefit. It is a corrupt act.

##### Corruption

Corruption is the misuse of one’s position for private gain. The gain may accrue to the individual making a corrupt decision or taking a corrupt action or it may accrue to family members, friends or others.

#### What is not Acceptable?

It is not acceptable for any member of the university to:

- Give or promise to give, accept or promise to accept, a payment, gift or hospitality with the expectation that a business or academic or employment advantage will be received.
- Give or promise to give, accept or promise to accept, a payment, gift or hospitality to a government official to facilitate or speed up a procedure or approval.
- Accept payment or a gift from a third party if they know or even suspect that it is being offered in expectation of the future receipt of a commercial, academic or employment advantage.
- Threaten any member of the university community who has refused to participate in a proposed act of corruption or bribery.
- Engage in other acts of corruption or bribery not directly listed above but which fall under the definitions of bribery or corruption given above.

### Responsibilities

Ultimate responsibility for this Policy lies with the Board of Trustees. However, the Board of Trustees requires that the President ensures that this policy is applied rigorously and fairly. The President in turn will delegate responsibility for the application of this policy to the Executive Vice-President and all the Vice-Presidents. Each senior manager must ensure that his or her staff are familiar with the Policy.

## What Steps Can be Taken to Prevent Bribery and Corruption

### i) Risk Assessment

All managers must assess the vulnerability of their operations to corruption and bribery. The Vice-President, Finance and Administration must coordinate and monitor these efforts. It is important to identify those areas in which we face bribery and/or corruption risks.

### ii) Risk Monitoring

Heads of Departments must take steps to assess corruption and bribery risks, to keep detailed records of activities which may face such risks and to keep proper records of these activities.

## How to Raise a Concern

All staff have a responsibility to be aware of the risks of corrupt acts and bribery and to help detect and report such activities. The university needs to create a safe environment for individuals to report suspected activities. If you are concerned that a corrupt act is taking place you should first report it to your immediate supervisor if that supervisor is not a party to the suspect activity. If the supervisor is a party to the suspect activity the behaviour should be reported to the Director of Human Resources. The Director of Human Resources must ensure that all staff are aware that this kind of disclosure is guaranteed by the university to be possible **without fear of reprisal**.

## Policy Revision History

Version No.	Update Brief	Approved Date
V1.0	New Policy	01-06-2006
V2.0	Revised and Updated	13-03-2023