

Policy: **Anti-corruption and Bribery**

Code: **10LP02**

Reviewed/ Revised: **19/07/2022**

Date of Next Review: **February 2024**

Policy Owner: **Managing Director**

Target audience: **Staff, Faculty, Students**

PURPOSE:

To ensure that the offer or acceptance of a gift does not create an obligation, or be construed by others to allege favouritism, discrimination, or other unacceptable practice.

SCOPE:

All EAHM Employees, full-time faculty members, adjunct lecturers and students including Study Abroad Students

DEFINITIONS:

Bribery: the giving or offering of a bribe.

Corruption: dishonest or fraudulent conduct by those in power, typically involving bribery.

Whistle-blower: the reporting by employees of suspected misconduct, illegal acts or failure to act within the organisation.

POLICY STATEMENT:

EAHM follows a zero-tolerance policy regarding corruption and bribery in all its operations. EAHM mandates that all its employees shall not engage in corruption and bribery in any form. All members of the BoG and the Industry Advisory Board, employees and students shall conduct all activities honestly, fairly, and professionally.

Articles 234-239 of the UAE Federal Law 3/1987 (also known as the UAE Federal Penal code) provide a legal framework to deal with the cases of corruption and bribery.

An act of bribery is committed if an individual accepts or promises a gift/benefit/another grant, whether directly or indirectly, in exchange for committing or neglecting an act in violation of his/her duties either for his own benefit or for the benefit of any other person, entity or establishment.

EAHM mandates that all employees and other relevant stakeholders of the institution shall not directly or indirectly be involved in any of the following activities in exchange for any gift/benefits/ grants either in cash/kind.

- a. Sharing assignments under the evaluation process.
- b. Sharing examination/ assignment papers before the scheduled date of assessment/ examination.
- c. Offering/promising/awarding undeserved grades.
- d. Offering/promising admission to any undeserving candidate.
- e. Offering/promising/awarding contracts to undeserving vendors.
- f. Offering/promising/awarding appointments to undeserving candidates.
- g. Offering/promising remission of disciplinary action.
- h. Any other related issues that breach the policies of the institution regarding integrity.

Dealing with Government Departments/ Entities

EAHM mandates that only authorized employees shall deal with Government departments/entities on its behalf.

While dealing with Government departments/ entities the concerned employee shall comply with the requirements of Articles 234-239 of the UAE Federal Law 3/1987 and all other applicable UAE Laws and Regulations.

Offering a gift/benefit/another grant, whether directly or indirectly, to a public servant is a punishable offence under the UAE Federal Law 3/1987 which may lead to imprisonment.

In case of any confusion regarding any applicable laws and regulations, the employee concerned should contact the Managing Director or Director of Operations for necessary clarifications.

Whistleblowing

EAHM supports all employees, students, vendors and other stakeholders to act as a whistleblower in case they suspect any instance of bribery and corruption, or they are victims of bribery and corruption.

They should immediately report the matter to the Managing Director. The Managing Director shall not disclose the identity of any whistleblower and protect the whistleblower from any vindictive action. In the case of bribery/ corruption involving the Managing Director, the whistleblower may inform the matter to Chairman of the BoG.

IMPLEMENTATION OF THE POLICY:

Due Diligence

The following procedures shall be followed for conducting due diligence and necessary action in reported cases of corruption and bribery involving students, employees, and third-party vendors:

- a. Cases of reported corruption/ bribery indulged by any student shall be referred to *Student Grievance Committee* (Policy 06ST25 Student grievance). The committee shall carry out due diligence and submits its finding to the Dean.
- b. Cases of reported corruption/ bribery indulged by any employee, or any third-party vendor shall be referred to *Employee Grievance Committee* (Policy 05FP13 Faculty and Professional Staff Grievances) the committee shall carry out due diligence and submits its finding to the Managing Director.
- c. Cases of reported corruption/ bribery indulged by the Director/ any member of the Industry Advisory board/ any member of the BoG shall be referred to the BoG. The BoG shall carry out due diligence.

In case any member of the Student Grievance Committee/ Employee Grievance Committee is involved in the reported corruption/bribery case, he/she shall not be part of the committee till the matter is disposed of.

Action

As part of our zero-tolerance policy toward corruption and bribery, the following actions shall be taken in proven cases of corruption and bribery:

- a. Where a student is found to be guilty, he/she shall be suspended from the program and the matter shall be reported to the legal authorities.

- b. Where an employee is found to be guilty, he/she shall be terminated from employment and the matter shall be reported to the legal authorities.
- c. Where a third-party vendor is found to be guilty, all contracts with such vendor shall be cancelled and the matter shall be reported to the legal authorities.
- d. Wherein a member of the Industry Advisory Board/ BoG is found to be guilty; he/she shall be removed from the board and the matter shall be reported to the legal authorities.

RESPONSIBILITY:

The Managing Director and Dean are responsible for the policy and its updates.

ASSOCIATED DOCUMENTS:

- Faculty & Staff handbook
- Students' handbook
- Policy 06ST25 Student Grievance
- Policy 05FP13 Faculty and Professional Grievances

MENTIONS:

- Student Handbook
- Faculty Handbook

DATE OF NEXT REVIEW:

This document should be reviewed by **February 2024**.

POLICY APPROVALS RECORD

Policy Name:	Anti-Corruption and Bribery		
Policy Code:	10LP02	Formerly:	NA
Date of first approval:	19/07/2022		

**Reviewed/
Updated**

Details of Amendment

Reviewed/ Updated	Details of Amendment