

Anti-Bribery & Corruption Policy & Procedures, including Gifts & Hospitality

ANTI-BRIBERY & CORRUPTION POLICY & PROCEDURES, INCLUDING GIFTS & HOSPITALITY

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1.0	August, 2022		New Document
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Dissemination

Through OU Support Service Portal and website to all OU students and Staff.

Internal Control and Validation

To ensure compliance with this policy and procedure:

- The Vice President of Operations will be responsible for implementation.
- The Project & Compliance Lead will monitor from the internal audit.

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1.1. Policy Objective

- 1.1.1. The purpose of this document is to define Oryx University Anti-Bribery & Corruption Policy and Procedures (including Gifts and Hospitality).

1.2. Scope

- 1.2.1. This policy applies to all OU staff and students. It also applies to agency and contract staff working for OU (including seconded staff, interns, and self-employed contractors), and all other persons associated with and acting for OU, whether directly or indirectly (“associated persons”).
- 1.2.2. This definition includes Governors, representatives, agents, subsidiaries, individuals appointed as directors of any company, consultants, contractors, and partners. To the fullest extent permissible by law, this policy shall apply in all jurisdictions in which OU operates.

1.3. Definitions

<i>Corruption</i>	Corruption is defined as dishonest or fraudulent conduct, typically involving bribery and/or misusing the power of authority of their professional role.
<i>Bribery</i>	Bribery is the offering, giving, receiving, or soliciting of any item of value (money, goods, favors or other forms of recompense) to influence the actions of an official or other person in charge of a public or legal duty.

1.4. Abbreviations

OU	Oryx University
HEI	Higher Education Institutions

1.5. Policy Statement

1.5.1. Position Statement and Commitment

- 1.5.1.1. OU is committed to the highest standards of integrity, probity, and ethics in all its dealings - wherever they may take place and in whatever context.
- 1.5.1.2. Bribery is both illegal and unethical and brings with it the potential for criminal liability and severe penalties - at both University and individual level.

- 1.5.1.3. The legislation is extensive and, crucially, the University's anti-bribery responsibilities do not end at the office door or campus gate. Those responsibilities potentially extend to any associated person, representative, agent, subsidiary, partnership, or body engaged on OU business, including those within and outside of Qatar.
- 1.5.1.4. The University has a zero-tolerance approach to bribery and serious action will be taken against anyone found to be involved in bribery, up to and including dismissal under the University's disciplinary processes. For associated persons, breach of this policy may result in contractual, legal and/or other sanction(s).
- 1.5.1.5. The University prohibits the offering, giving, soliciting or the acceptance of any bribe in whatever form to, or from, any person or company (public or private) by anyone associated with the University.

1.5.2. Risk Areas for the University

- 1.5.2.1. Effective risk management lies at the very heart of this policy. Risk management is a crucial element of the OU's overall governance process. It facilitates identification of the specific areas where University does, or could, face bribery & corruption risks & allows mitigation plans, actions, & protections to be put in place.
- 1.5.2.2. Global custom and practice in business can be deeply rooted in the attitudes, cultures, and economic prosperity of a particular region, any of which can change at any time.
- 1.5.2.3. Moreover, Qatar norms may not be applicable in some parts of the world which may be technically significantly different in other countries.
- 1.5.2.4. In common with other Higher Education Institutions (HEIs), the University faces a range of bribery risks throughout its activities, operations, and geographies. These risks include, but are not limited to:
- 1.5.2.4.1. Purchase of goods and services by the University, particularly the award of tenders and contracts
 - 1.5.2.4.2. Tenders and bids for research contracts which are made by the University
 - 1.5.2.4.3. The giving and receiving of gifts and hospitality
 - 1.5.2.4.4. The admission and recruitment of students (particularly from overseas)
 - 1.5.2.4.5. Collaborations, joint ventures, partnerships, affiliations (academic and commercial) particularly with organizations based overseas.
 - 1.5.2.4.6. Student assessments / examinations
 - 1.5.2.4.7. Subsidiaries and spin out companies

1.5.3. Anti-Bribery Measures at the University

- 1.5.3.1. The Director of Operations has responsibility for the Anti-Bribery and Corruption Policy (including Gifts & Hospitality), which will be reviewed annually by the Heads of Department.
- 1.5.3.2. Line Manager responsibilities: It is the responsibility of all line managers to ensure that this policy is fully and regularly communicated to those involved with University business within their area. Crucially, this will include communication not only to staff but other external agencies e.g., agents, representatives, and contractors.
- 1.5.3.3. The key policies for prevention of bribery are listed in the Relevant Policies and Documents section of this policy and include appropriate record keeping, internal controls as well as monitoring.
- 1.5.3.4. All relevant standard contracts & documents have also been updated to include anti-bribery provisions. It is particularly important for all staff and associated persons to:
 - 1.5.3.4.1. Get to know every organization which the University is intending to work with – whether the organization will be a collaborative partner, supplier, contractor, consultant, or something else – to check that it has an embedded anti-bribery culture & has adopted similar robust anti-bribery policies and procedures.
 - 1.5.3.4.2. Use the up-to-date and applicable standard contract or document which incorporates anti-bribery provisions & do not amend any of those antibribery provisions without obtaining legal advice from the Operations Department.
- 1.5.3.5. The University has procedures used to ensure that, before establishing a relationship with a third party, that sufficient due diligence is performed to determine the third-party commitment to ethical business practice consistent with Anti-Bribery and Corruption Policy.
- 1.5.3.6. **Training** on the Anti-Bribery and Corruption Policy is mandatory for all staff. Training includes making all staff aware of their personal responsibilities and duty to always adhere strictly to this policy.
- 1.5.3.7. The University has fair understanding about the whistleblowing to be in place to ensure that all breaches or suspected breaches are fully investigated and, if appropriate, disciplinary measures are invoked and prompt action taken to remedy the breach.
- 1.5.3.8. **Staff Responsibilities:** It is important for all staff / associated persons to:
 - 1.5.3.8.1. Read, understand, and comply with this Anti-Bribery & Corruption Policy
 - 1.5.3.8.2. Avoid any activity that might lead to, or suggest, a breach of this Anti-Bribery and Corruption Policy

- 1.5.3.8.3. Alert the University as soon as possible in the event of a belief or suspicion that a conflict with this Policy has occurred or may occur in the future.

1.6. Reporting concerns

- 1.6.1. If an individual has a concern and wishes to make a disclosure, they should inform the Director of Operations.
- 1.6.2. In the event of a disclosure concerning the Director of Operations, the disclosure should be made to the President
- 1.6.3. The prevention, detection and reporting of bribery is the responsibility of everyone associated with the University. The University requires any potential breaches of this policy and bribery offers to be reported.
- 1.6.4. Any allegations of misconduct under this policy within the jurisdiction of the University will be taken very seriously. If appropriate, action may be taken under the University's disciplinary processes.
- 1.6.5. Attempted bribery or acceptance of a bribe may be considered as gross misconduct and, where it is considered that a criminal offence has occurred, the competent authority may be informed.
- 1.6.6. "Red flags" which may indicate bribery or corruption are set out in Appendix 1.

1.7. Gifts, Hospitality & Entertainment

1.7.1. Context

- 1.7.1.1. Gifts, Hospitality and Entertainment is a collective term for the receipt or offer of gifts, meals, travel costs, entertainment, tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to the University.
- 1.7.1.2. It should be noted, however, that travel costs would only exceptionally be borne by a third party, and that the travel authorization process is a key element of the University's overall corporate governance infrastructure and best practice.

1.7.2. Allowable vs Not Allowable Gifts and Hospitality

1.7.2.1. Allowable Gifts and Hospitality:

- 1.7.2.1.1. Normal, reasonable, and proportionate hospitality given or received as part of the University's wider student, commercial, and promotional campaign.
- 1.7.2.1.2. University's marketing activities are genuinely and demonstrably aimed at building a good business relationship.
- 1.7.2.1.3. Improving the profile of the University is allowable, within limits (See section 1.7.2.3. below).

1.7.2.2. Gifts and Hospitality Not Allowable

- 1.7.2.2.1. Staff of the University are not allowed to encourage directly or indirectly, force, seek or expect any sort of financial or non-financial gifts or hospitality from other stakeholders of the University.
- 1.7.2.2.2. Other stakeholders include, but are not limited to anyone who has a professional relationship with the University with regards to its services, products, facilities, assets, or management including students, suppliers, contractors, other employees, parents or family members of students, service providers etc.
- 1.7.2.2.3. Hospitality must not be accepted by employees of the University in circumstances that may allow the employee to appear to be unduly influenced in favor of the provider of that hospitality.
- 1.7.2.2.4. The above circumstances might, for example, include the proximity of the hospitality to the award of a contract.
- 1.7.2.2.5. The gift or receipt of hospitality which is aimed at securing an improper business or other advantage, or which may affect the recipient's independence is obviously not permissible.
- 1.7.2.2.6. No gifts or hospitality should be offered or received with any form of secrecy.
- 1.7.2.2.7. Cash or cash equivalents should not be given or received as a gift under any circumstances
- 1.7.2.2.8. Cash equivalents, such as vouchers or discount cards, should not be given to, or received from, external parties, except in specific circumstances where a modest token of gratitude is appropriate -e.g., volunteering activities such as research participants.

1.7.2.2.9. The University does not make political donations. Staff are expressly forbidden to provide any donation or gift to political parties on behalf of the University.

1.7.2.2.10. Hospitality can amount to real or perceived bribery, and caution should always be exercised. If there is any doubt about the propriety of hospitality, it should not be accepted or offered.

1.7.2.2.11. In general, the simple 'acid' test for hospitality can be phrased as 'Is it reasonable, and could I reciprocate?'

1.7.2.3. Authority to Accept/Offer Gifts and Hospitality

1.7.2.3.1. Gifts and hospitality that comply with the policy must be authorized for acceptance as follows – note approval should be sought in advance, retrospective authorization should be sought in exceptional circumstances only.

1.7.2.3.2. If a gift or hospitality is not in keeping with circumstances then every effort must be made to refuse the offer, without offending the person or organization making the offer.

1.8. Advice and Information

1.8.1. Further Information on this Policy and Procedures are available on the University's Webpages at <https://www.oryx.edu.qa/policies/> or by contacting the Academic Registry via telephone numbers +974 4021 0000 or via email at registry@oryx.edu.qa.

1.8.2. The OU Academic Registry Staff are available to advise Students on matters such as concerns about potential criminal offences, personal safety, and police procedures. If students wish to contact, they can do so at Academic Registry.

1.8.3. Students can seek advice and support from the OU by various means through personal tutor, student wellbeing officer, Associate Dean of Students Wellbeing and Success, in regard to concerns on this Policy.

1.8.4. Further information and contact details are available on the University Web pages at <https://www.oryx.edu.qa/>.

1.9. Appendix

Appendix 1: Examples of “red flags”

Examples of “red flags” which may indicate bribery or corruption: Facilitation payments, which are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). Also, there are payments which are typically made in return for a business favor or advantage. All such payments are bribes.

The following scenarios raise concerns under various anti-bribery and anti-corruption laws.

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with officials.
- a third party insists on receiving a commission or fee payment before committing to signing a contract with us or carrying out an authoritative function or process for us.
- a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- a third party requests an unexpected additional fee or commission to "facilitate" a service.
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- a third-party request that a payment is made to "overlook" potential legal violations.
- a third-party request that you provide employment or some other advantage to a friend or relative.
- you receive an invoice from a third party that appears to be non-standard or customized.
- a third party insists on the use of side letters or refuses to put terms agreed in writing.
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- a third party requests or requires the use of an agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to us.
- you are offered an unusually generous gift or offered lavish hospitality by a third party.