

Policy Subject: Anti-Bribery and Corruption Policy	Policy number: 30/A. A/2018	Date of last revision: 1/1/2022
Implementing body: Administrative Affairs	Implementing start date: 1/9/2018	Policy reference: Administrative Affairs

Policy overview:

The "Anti-Bribery and Corruption Policy" outlines Palestine Ahliya University's commitment to conducting all university activities with integrity, transparency, and compliance with anti-bribery and corruption laws and regulations. This policy aims to prevent bribery and corrupt practices in all interactions involving university personnel, students, vendors, contractors, and other stakeholders.

Objectives:

The objectives of this policy are to:

1. Establish a zero-tolerance approach to bribery, corruption, and unethical behavior within Palestine Ahliya University.
2. Ensure compliance with applicable anti-bribery and corruption laws, including but not limited to the Palestinian Anti-Corruption Law and international standards such as the United Nations Convention against Corruption.
3. Safeguard the university's reputation, financial integrity, and ethical standards by promoting a culture of honesty, accountability, and ethical conduct.
4. Provide guidance and support to university personnel and stakeholders on identifying, preventing, and reporting instances of bribery and corruption.

scope:

This policy applies to all individuals and entities associated with Palestine Ahliya University, including but not limited to employees, officers, trustees, students, volunteers, contractors, suppliers, agents, and representatives. It encompasses all university activities, operations, transactions, and relationships, both domestic and international.

Policy statements:

1. Zero Tolerance: Palestine Ahliya University prohibits bribery, corruption, extortion, kickbacks, and any other form of unethical behavior in all its operations and relationships.
2. Compliance with Laws: All university personnel and stakeholders must comply with applicable anti-bribery and corruption laws and regulations, as well as internal policies and procedures established to prevent bribery and corruption.
3. Gifts, Entertainment, and Hospitality: The acceptance and provision of gifts, entertainment, and hospitality must be reasonable, transparent, and in compliance with university policies and applicable laws. Any gifts or hospitality offered or received must not influence or be perceived to influence business decisions.
4. Conflicts of Interest: University personnel must disclose any actual or potential conflicts of interest that may compromise their impartiality, objectivity, or integrity in carrying out their duties. Conflicts of interest must be managed and mitigated in accordance with university policies and procedures.
5. Due Diligence: Palestine Ahliya University will conduct due diligence on third parties, including vendors, contractors, suppliers, and business partners, to assess their integrity, reputation, and compliance with anti-bribery and corruption standards before entering into any agreements or relationships.
6. Reporting and Whistleblowing: The university encourages the reporting of suspected or actual instances of bribery, corruption, or unethical behavior. Confidential reporting channels will be provided to allow individuals to raise concerns without fear of retaliation. Reports will be promptly investigated, and appropriate corrective action will be taken.

Procedures:

1. Training and Awareness: Provide regular training and awareness programs on anti-bribery and corruption policies, procedures, and ethical standards for all university personnel and stakeholders.
2. Risk Assessment: Conduct periodic risk assessments to identify areas of vulnerability to bribery and corruption and implement controls to mitigate risks.

3. **Monitoring and Enforcement:** Monitor compliance with the Anti-Bribery and Corruption Policy, investigate alleged violations, and impose disciplinary actions and sanctions for non-compliance.
4. **Record-Keeping:** Maintain accurate records of gifts, entertainment, hospitality, and business transactions to ensure transparency and accountability.
5. **Review and Update:** Review and update the Anti-Bribery and Corruption Policy regularly to reflect changes in laws, regulations, and best practices, as well as emerging risks and challenges.
6. By adhering to this "Anti-Bribery and Corruption Policy" and implementing the outlined procedures, Palestine Ahliya University aims to uphold the highest standards of integrity, transparency, and ethical conduct in all its operations and relationships, contributing to trust, credibility, and sustainability.