



Westford University College (WUC)

Anti-Bribery & Corruption Policy

Revised March 2020

Contents

| | | |
|---|---------------------------------------|---|
| 1 | Anti-Bribery & Corruption Policy..... | 3 |
| 2 | Gifts/ Favours | 3 |
| 3 | Facilitating Payments | 4 |
| 4 | How to raise a concern..... | 4 |
| 5 | Violation of Policy | 4 |

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1 Anti-Bribery & Corruption Policy

The purpose of this policy is to ensure that members of the Westford University College (WUC) Community conduct their business in an ethical manner and understand and adhere to the requirements of all applicable anti-bribery laws and best practices. Westford University College (WUC) is committed to operating in an ethical manner and in compliance with applicable anti-bribery laws and regulations in UAE, including other jurisdictions and areas in which it operates. Westford University College (WUC) policy is to prohibit the direct or indirect giving or receiving of improper payments or other benefits for purposes of obtaining any advantage. More specifically, members of the Westford University College (WUC) may not directly or indirectly:

1. Make promise, approve, authorize, or offer to give to anyone anything of value (including but not limited to cash payments) for the purpose of improperly inducing the recipient to take (or to refrain from taking) action that would bestow a benefit to him, or organization, or any other party.
2. Receive or accept anything of value (including but not limited to cash payments), if such item of value is intended to induce or reward improper performance of one's responsibilities or duties or to gain an improper advantage. For example accepting gifts or cash from students, or other members to benefit such people inappropriately and unethically.

2 Gifts/ Favours

"Gifts /Favour" means anything of value, including, but not limited to, money, stored-value cards, gratuities, commissions, rebates, loans, loan guarantees, payment of debts, transportation, use of property, charitable donations, medical treatments, medication, entertainment, hospitality, travel, internships (paid or unpaid), employment opportunities, admission opportunities, goods, or services. Gifts/ Favour to or from any public/ non-public official that meets all of the following criteria is generally permitted:

- a) It does not include cash or a cash-equivalent gifts (e.g., gift certificates, vouchers, or other items that can be readily exchanged for cash);
- b) It is not intended to improperly influence or reward any person regarding any matter or transaction involving Westford University College (WUC) or another party;
- c) It is unsolicited, given infrequently, and given openly, not secretly;
- d) It does not breach any other local law or Westford University College (WUC) policy;

- e) It is given or received in Westford University College's (WUC's) name and not in the name of the individual member of the Westford University College (WUC) staff;
- f) It is of an appropriate type and value, given at an appropriate time, taking into account the motive, local custom and laws governing the country.
- g) It has a value of less than AED 300.

3 Facilitating Payments

Facilitating payments are not permissible under this policy. A facilitating payment is a payment made to a Public Official to further routine governmental action (e.g., processing visas, clearing customs, providing police protection, or providing any other services) that is of a non-discretionary nature (i.e., that the official is already bound to perform). A legally mandated administrative fee for expediting government services is not a prohibited facilitating payment (in such cases, a proper receipt should be retained). A facilitating payment may be made by a member of the Westford University College (WUC) Community or on a person's behalf with proper authority.

4 How to raise a concern

If any employee or an external person feels or undergoes the presence of corruption in any Westford University College (WUC) dealings, it will be his/her moral duty to bring this to the notice of the concerned company authorities. Disciplinary Committee will investigate and take appropriate action.

5 Violation of Policy

Individuals found to violate this policy may be subject to disciplinary action by Westford University College (WUC) Disciplinary Committee, and also may subject themselves and Westford University College (WUC) to civil, criminal fines, prosecution and significant reputational damage. While it is the policy of Westford University College (WUC) to prohibit the provision of improper payments or other benefits to all individuals (in both the private and public sectors), interactions with Public Officials are of heightened concern due to the increased risk for violations of applicable anti-bribery laws.

Members of the Westford University College (WUC) Community should report immediately any suspected or actual violations of this policy or anti-bribery laws. Complaints should be made in accordance with the 'Complaints Policy' of Westford University College (WUC). Any staff member who violates this policy may be subject to disciplinary action, up to and including dismissal or expulsion, as applicable by law and

Westford University College (WUC) policies. Violations of this policy may also result in civil and criminal penalties for such individuals in multiple jurisdictions.

[Note: The Provider in this context is Westford University College (WUC)]