



## Bribery and Fraud Policy

### Introduction

Bribery is a criminal offence. Jesus College prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Jesus College employees or by third parties acting for or on behalf of Jesus College.

### Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e., gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for Jesus College, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If we suspect that a member of staff has committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against the member of staff, which may result in their dismissal, or the cessation of our business arrangement with a company.

If as an employee or person working on our behalf, a member of staff suspects that an act of bribery or attempted bribery has taken place, even if the member of staff is not personally involved, s/he is expected to report this to the relevant College Officer. They may be asked to give a written account of events.

The College will ensure that its staff have received the training necessary for them to comply with this policy, and will ensure that third parties working on behalf of the College are aware of the College's policy.

The Risk and Audit Committee will carry out periodic risk assessments related to bribery and fraud.

The Principal is responsible for ensuring compliance with this policy.

### Gifts and hospitality

Jesus College realises that the giving and receiving of gifts and hospitality as a reflection of *friendship or appreciation* where nothing is expected in return may occur, or even be commonplace. This does **not** constitute bribery where it is proportionate and recorded properly. However, all gifts with a value in excess of £30 must be recorded with the relevant College Officer.

If a member of staff or anyone working on our behalf in connection with our business is in any doubt as to whether offering or receiving a gift or hospitality is a reflection of friendship or appreciation or, could be construed as a bribe, then they should seek prior written approval from the relevant College Officer.

As the law is constantly changing, this policy is subject to review and Jesus College reserves the right to amend this policy without prior notice.

24 January 2012