

ANTI BRIBERY POLICY

INTRODUCTION

Bribery is a criminal offence. Hertford College prohibits any form of bribery. We require compliance, from everyone connected with the College and its subsidiaries, 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 Hertford College employees or by third parties acting for or on behalf of the 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 Hertford 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 Bursar and may be asked to give a written account of events.

Staff are reminded of the College's whistle-blowing policy which is available in the Staff Handbook (Making a Protected Disclosure), or upon request.

GIFTS AND HOSPITALITY

Hertford College recognises 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 £50 must be recorded in the Gifts and Hospitality Register.

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 the College reserves the right to amend the policy without prior notice.

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