



## BRIBERY POLICY

### INTRODUCTION

Bribery is a criminal offence. The Queen's College prohibits any form of bribery. It requires compliance from everyone connected with the College with the highest ethical standards and antibribery laws applicable. Integrity and transparency are of utmost importance to the College and there is zero tolerance towards corrupt activities of any kind, whether committed by Queen's employees or by third parties acting for or on behalf of Queen's.

### POLICY

It is prohibited for any employee or person working on behalf of the College 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, either directly or indirectly. This applies whether the bribe is intended to secure advantage for the College, or a personal advantage for the individual involved, or anyone connected with the individual.

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

If, as an employee or person working on our behalf suspects that an act of bribery or attempted bribery has taken place, even if the member of staff is not personally involved, it must be reported to the relevant College Officer immediately. The staff member 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, or upon request.