



GITAM: GANDHI INSTITUTE OF TECHNOLOGY AND MANAGEMENT

(Deemed to be University u/s 3 of the UGC Act, 1956)

A Category – I Deemed to be University

Visakhapatnam | Hyderabad | Bengaluru

The Policy for

Anti Bribery

Contents

1	Anti-Bribery and Corruption Statement:	1
2	Introduction	1
3	Scope and Purpose	1
4	Policy Statement.....	2
4.1	Responsibilities and Observance	3
4.2	Guidance and Recognition	3
4.3	Legal Obligations	3
4.4	Third Parties.....	3
5	Responsibilities.....	3
5.1	Annual Report and Recommendations	4
5.2	Alignment of Documents and Procedures	4
5.3	Coordination of Responses	4
5.4	Policy Dissemination and Training	4
5.5	Oversight of Risk Assessments and Due Diligence	4
6	Implementation	4
7	Monitoring and Continuous Improvement	5

1 Anti-Bribery and Corruption Statement:

GITAM Deemed to be University is firmly committed to conducting all aspects of its academic, administrative, and commercial activities with the utmost adherence to laws and ethical standards. It unequivocally prohibits any form of bribery or corruption by its staff or associates, regardless of jurisdiction. GITAM upholds principles of professionalism, fairness, and effectiveness in its operations, actively implementing systems to combat bribery and corruption.

2 Introduction

GITAM upholds a steadfast policy requiring all staff and students to engage in business with unwavering honesty, refraining from any involvement in corrupt practices or acts of bribery to gain an unfair advantage.

Bribery constitutes a criminal offense in most jurisdictions, posing significant legal and reputational risks to the University and its employees. Such actions could lead to prosecution, fines, imprisonment, and tarnishing of the University's standing.

For any concerns or feedback, individuals may confidentially approach the Registrar, who oversees policy management within the University. Alternatively, staff members can utilize the University's prevailing whistleblowing procedures to raise concerns.

3 Scope and Purpose

The University is unwaveringly committed to upholding the highest standards of integrity across all its operational domains, ensuring a transparent and honest conduct in its affairs. Acknowledging the potential emergence of bribery and fraud risks in various contexts, the University endeavours to adequately inform, guide, and educate its employees. This enables them to effectively assess and mitigate the risks associated with bribery and fraud, introducing preventive measures where necessary.

Aligned with the Act's provisions, this policy extends its coverage to encompass all individuals engaged in work or services for or on behalf of the University, spanning various roles and levels, including temporary staff, agency workers, contractors, consultants, volunteers, interns, and agents ("Staff"). This inclusiveness applies universally, encompassing all the campuses, subsidiary entities, and third-party

organizations, regardless of geographical location, that provide services to or conducts business on behalf of the University.

The primary purpose of this policy is to provide comprehensive assistance to University personnel, elucidating their obligations in upholding the University's stance against bribery and fraud. Furthermore, it furnishes information and guidance on recognizing, addressing, and resolving issues related to bribery and fraud.

It's important to note that bribery and fraud carry severe penalties according to the Indian Penal Code Section 171B. The University Council has endorsed this policy, which is applicable across the University. The scope of this policy extends to all University activities, spanning research, teaching, commercial endeavours, and beyond.

The University sets high expectations for stringent compliance with this policy from all its staff and affiliated individuals. Any violations of this policy will prompt disciplinary actions, potentially leading to dismissal for misconduct or gross misconduct. Furthermore, where a third party engaged in university-related services is found to have violated this policy, appropriate measures may be undertaken, including terminating the respective contractual association.

It's crucial to emphasise that the University assures individuals that adherence to this policy will not result in repercussions, even if the University loses contracts, bids, or other opportunities due to refusing a bribe.

4 Policy Statement

At the GITAM, we are unwaveringly committed to conducting all aspects of our operations with the utmost integrity, ethics, and transparency. Our dedication to ethical conduct extends across every facet of our activities, from research and teaching to governance and financial transactions. We unequivocally reject any form of bribery or corruption and adhere to a zero-tolerance stance against such practices.

Our commitment to professionalism, fairness, and integrity underscores our interactions and relationships within the University and beyond. We are resolute in implementing robust systems that prevent bribery and corruption, and we diligently

uphold all applicable anti-bribery and corruption laws in our jurisdictions. This includes strict adherence to the Indian Penal Court Section 171B.

The policy is designed to fulfil several key objectives:

4.1 Responsibilities and Observance

We outline the responsibilities of all individuals associated with the University in upholding our stance against bribery and corruption. This extends to our staff, third parties, and all those we engage with during our work.

4.2 Guidance and Recognition

We provide comprehensive information and guidance to our personnel on recognising, addressing, and preventing bribery and corruption issues.

4.3 Legal Obligations

We emphasise that bribery and corruption are punishable offences, carrying potential consequences of imprisonment for individuals and significant fines for the University. Our commitment to legal compliance is unwavering.

4.4 Third Parties

We extend our commitment to ethical conduct to all third parties providing services to or on behalf of the University. We expect the highest standards of compliance from these parties as well.

Our Anti-Bribery and Corruption Policy underscores our dedication to maintaining an environment of integrity, honesty, and ethical conduct. It is not just a set of rules but a reflection of our commitment to upholding the highest standards of professional practice and good governance. By adhering to these principles, we safeguard our reputation, protect our stakeholders, and contribute to a culture of trust and accountability within the University community.

5 Responsibilities

The Registrar shall assume the following duties:

Maintenance of Incident Register: Maintain a comprehensive register documenting reported bribery and fraud incidents, as stipulated by this Policy.

5.1 Annual Report and Recommendations

Compile an annual report for the Audit Committee detailing the Policy's implementation progress. This report should encompass outcomes of pertinent risk assessments, due diligence exercises, and reported instances of bribery and fraud. The Registrar's role contributes to this Policy's continuous monitoring and evaluation. Additionally, the Registrar is authorised to propose necessary Policy changes as circumstances dictate.

5.2 Alignment of Documents and Procedures

Ensure that all standard University documents and procedures, spanning procurement terms, fundraising documentation, and employment terms and conditions, align with the mandates outlined in this Policy.

5.3 Coordination of Responses

Facilitate the University's coordinated response to any investigation or charges about anti-bribery or fraud legislation.

5.4 Policy Dissemination and Training

Establish robust mechanisms for communicating this Policy to all staff and pertinent associated individuals. Implement tailored training programs to educate staff on the Policy's principles.

5.5 Oversight of Risk Assessments and Due Diligence

Oversee the creation of focused bribery and fraud risk assessments and the execution of due diligence activities in key operational areas. This proactive approach aims to comprehensively evaluate bribery and fraud risks and instigate appropriate mitigative measures.

6 Implementation

The responsibility for executing this policy rests with the Audit Committee, with support from the Registrar. The University's steadfast commitment to preventing bribery and fraud will be consistently and transparently communicated to staff and associated individuals. The Registrar will oversee the implementation of these communication processes.

The Audit Committee will undertake an annual assessment to identify and evaluate the nature and scope of bribery and fraud risks confronting the University. Adjustments to this policy or other relevant policies will be made to align with the outcomes of these risk assessments.

Staff and associated individuals are encouraged to conduct risk assessments when the potential for bribery and fraud is perceived within specific transactions involving third parties or territories. Before any engagement, thorough due diligence is recommended.

This policy will be accessible to all staff members, and the University will provide tailored training for those most likely to encounter instances of bribery and fraud. The University will communicate its unequivocal stance against bribery and fraud to suppliers, contractors, and business partners at initiating their business relationships and periodically after that.

The University will periodically monitor and review the procedures outlined in this and other policies to deter bribery and fraud. The Audit Committee will conduct comprehensive reviews at least every three years to ensure these procedures' relevance, sufficiency, and effectiveness. Adjustments to this Policy may occur in response to evolving legal mandates, best practice recommendations, and any identified instances of bribery and fraud.

7 Monitoring and Continuous Improvement

The University is dedicated to ensuring the continuous effectiveness of its anti-bribery policies and procedures. To achieve this, the Policy will undergo regular reviews overseen by the Policy Oversight Group. These reviews will be informed by insights from the University's risk management and audit processes, ensuring that our anti-bribery measures remain robust and responsive.
