



Anti-Bribery and Corruption Policy

Introduction

Aswan University is committed to conducting all its affairs with the utmost integrity and in full compliance with applicable laws and regulations, including those related to anti-bribery and corruption.

This policy outlines the principles and guidelines that govern our commitment to preventing bribery and corruption in all aspects of our operations.

Principles

Our anti-bribery and anti-corruption principles are:

- We will not tolerate any form of bribery or corruption.
- We will act with integrity and honesty in all our dealings.
- We will be transparent in our operations.
- We will hold ourselves and our employees accountable for our actions.

Policy Objectives

The primary objectives of this policy are:

- a. **To prevent bribery and corruption in any form**, whether direct or indirect, involving Aswan University, its employees, agents, contractors, or any other third parties acting on behalf of the University.
- b. **To ensure that all interactions with government officials**, suppliers, partners, students, and other stakeholders are conducted in a transparent, ethical, and legal manner.
- c. **To establish a robust framework for identifying**, preventing, and addressing bribery and corruption risks within the University's activities.

Scope

This policy applies to all employees, contractors, agents, and any other individuals or entities acting on behalf of Aswan University. It covers all University operations, whether conducted within Egypt or internationally.



Responsibilities

All employees of Aswan University have a responsibility to uphold our anti-bribery and anti-corruption policy. This includes:

- Complying with the code of conduct.
- Reporting suspected cases of bribery and corruption.
- Raising concerns about any potential breaches of the policy.

Policy Guidelines

- Compliance with Laws and Regulations:** Aswan University and its representatives must adhere to all applicable anti-bribery and corruption laws and regulations, including the Egyptian Penal Code and any other relevant international conventions and treaties.
- Prohibition of Bribery and Corruption:** It is strictly prohibited to offer, promise, give, solicit, or accept bribes, kickbacks, or any improper advantage, whether financial or non-financial, to or from any individual or entity for the purpose of obtaining or retaining business or securing any improper advantage.
- Gifts, Hospitality, and Entertainment:** Gifts, hospitality, and entertainment offered or received in the course of University business must be modest, appropriate, and in line with accepted business practices. Any gifts or benefits that could create an impression of improper influence or compromise the recipient's objectivity are strictly prohibited.
- Facilitation Payments:** Facilitation payments are not permitted under any circumstances. These are small payments made to expedite routine government actions, and their use is considered a form of bribery.
- Third-Party Due Diligence:** Aswan University shall conduct thorough due diligence on all third parties, including suppliers, agents, consultants, and business partners, to ensure they comply with anti-bribery and corruption standards.
- Reporting and Whistleblowing:** The University encourages all employees and stakeholders to report any suspected or actual instances of bribery or corruption promptly. A confidential and anonymous whistleblowing mechanism will be established to facilitate reporting.
- Consequences of Non-Compliance:** Any individual found to be involved in bribery or corruption will be subject to disciplinary action, up to and including termination of employment or contract. Legal action may also be pursued, and the University will cooperate fully with law enforcement authorities in any investigation.



Implementation

To ensure effective implementation of this policy, Aswan University will:

- a. Provide training and awareness programs to all employees and relevant stakeholders to ensure they understand their responsibilities under this policy.
- b. Conduct regular risk assessments to identify and address potential bribery and corruption risks within University operations.
- c. Establish a compliance officer or committee responsible for overseeing the implementation and enforcement of this policy.
- d. Conduct periodic reviews of the policy to ensure its relevance and effectiveness in preventing bribery and corruption.

Monitoring and Review

We will monitor and review our anti-bribery and anti-corruption policy on an ongoing basis to ensure that it is effective. We will also conduct regular audits to assess our compliance with the policy.

Communication

This policy will be communicated to all employees, contractors, agents, and relevant stakeholders. It will be made accessible on the University's website and any other relevant communication platforms.

Sanctions

Any employee who breaches this policy will be subject to disciplinary action, up to and including dismissal. We will also report any suspected cases of bribery or corruption to the relevant authorities.

Conclusion

Aswan University is committed to fostering a culture of integrity, transparency, and accountability. This Anti-Bribery and Corruption Policy reflects our dedication to preventing bribery and corruption in all our activities and upholding the highest ethical standards. Compliance with this policy is essential for the University's reputation, credibility, and continued success in achieving its mission and goals.