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EAST WEST UNIVERSITY

Anti-Bribery and Anti-Corruption Policy of East West University

2024

Anti-Bribery and Anti-Corruption Policy of East West University

1. Purpose of the Policy

East West University (EWU) is committed to conducting its operations ethically, transparently, and in compliance with all relevant laws and regulations on bribery and corruption. This policy clearly defines the university's position on bribery and corruption, outlines expected behavior and provides mechanisms for preventing and addressing such activities. The policy ensures compliance with the Penal Code 1860, the Prevention of Corruption Act 1947, the Anti-Corruption Commission Act 2004, the Whistleblower Protection Act, 2011, and the Anti-Corruption Commission (Amendment) Bill 2013.

2. Scope of the Policy

This policy applies to all individuals associated with EWU, including but not limited to:

- a. Members of the statutory committees of EWU
- b. External members related to academic activities of EWU
- c. University officials, staff, and faculty members
- d. Students
- e. Contractors, suppliers, vendors, and other third-party service providers
- f. Consultants, business partners, and representatives engaged with or acting on behalf of EWU
- g. Visitors and any other external stakeholders involved in university-related matters

3. Policy Statement

EWU upholds a zero-tolerance approach to bribery and corruption. The university prohibits any form of direct or indirect bribery and strives to uphold the highest standards of integrity and transparency in its operations and relationships.

4. Definitions of Key Terms

- 4.1 **Bribery:** The act of offering, giving, receiving, or soliciting any item of value (including money, gifts, services, or other benefits) to influence the actions of an individual or entity in a position of trust.
- 4.2 **Corruption:** The abuse of power for personal or organizational gain, including acts such as fraud, embezzlement, favoritism, and misuse of public office.
- 4.3 **Facilitation Payments:** Small payments made to expedite or secure routine administrative actions. Such payments are illegal and prohibited under this policy.

5. Prohibited Activities

The following activities are expressly prohibited at EWU

- a. Offering, giving, or receiving any form of bribe, including gifts, favors, money, or other inducements intended to influence a person's actions or decisions.
- b. Engaging in or attempting to engage in corrupt practices such as fraud, misuse of authority, or embezzlement.
- c. Providing or receiving gifts or hospitality that could be perceived as bribery or as a means to gain undue influence.
- d. Making facilitation payments, even if customary in certain contexts, as these are considered a form of bribery.
- e. Using university funds, resources, or influence to secure personal or organizational gain unlawfully.
- f. Giving undue academic advantage to any student.

6. Prohibited Practices Related to Gifts, Hospitality, and Donation

6.1 Giving, promising, offering, or accepting gifts, entertainment, hospitality, or donations are prohibited in the following circumstances:

- a. Expectation of Business Advantage: Gifts, hospitality, or donations must not be given, promised, or offered with the expectation or hope that a business advantage will be received, or as a reward for a business advantage already provided.
- b. During Negotiations or Tender Processes: No gifts, hospitality, or donations may be given or received during any negotiations, tenders, or similar processes if they could be perceived as being intended to influence or are likely to influence the outcome.
- c. Lavish or Extravagant Gifts: Gifts, hospitality, or donations that are unduly extravagant concerning the circumstances are strictly prohibited.
- d. Involving Foreign Public Officials: Gifts, hospitality, or donations must not be given or received from foreign public officials, including government officials or representatives, members of public bodies, and politicians, as such actions could be interpreted as attempts to gain undue influence.

6.2 Acceptable Practices

- a. Transparency and Documentation: Any gifts, hospitality, or donations given or received must be properly documented, reported to the designated department, and subject to review to ensure compliance with EWU's policies.
- b. Reasonable and Proportionate: Where appropriate, gifts or hospitality should be reasonable, proportionate, and aligned with cultural norms while never crossing the line into bribery or corrupt conduct.

7. Prohibition of Facilitation Payments

- a. Prohibited Activities: EWU staff, associated persons, or anyone acting on behalf of the university are strictly prohibited from offering, making, demanding, or accepting any form of facilitation payment.
- b. No Exceptions: There are no exceptions to this prohibition, regardless of whether such payments may be customary in specific locations or contexts where the university operates.

8. Responsibilities and Obligations

All EWU employees, students, and associated parties are required to:

- a. Avoid Bribery and Corruption: Conduct themselves with integrity, avoid situations that may give rise to corruption, and refuse any form of bribe or improper inducement.
- b. Comply with Laws and Regulations: Familiarize themselves with the Penal Code 1860, the Prevention of Corruption Act 1947, and the Anti-Corruption Commission Act 2004, as well as EWU's internal policies.
- c. Report Violations: Promptly report any suspected instances of bribery or corruption to the designated department or committee.

9. Reporting and Whistleblower Protection Mechanism

- a. Reporting Channels: Individuals may report suspected acts of bribery or corruption confidentially through reporting channels, e.g., hotline, email, and designated contact points.
- b. Protection for Whistleblowers: EWU is committed to protecting whistleblowers from retaliation, harassment, or any negative consequences arising from reporting in good faith. The confidentiality of the whistleblower will be fully maintained.
- c. Handling of Reports: All reports of suspected misconduct will be thoroughly investigated, and appropriate action will be taken if necessary.

10. Record-Keeping and Transparency

EWU is committed to maintaining accurate records of all financial transactions and dealings. These records must be kept transparent and available for audits to prevent and detect any potential acts of bribery or corruption. False or misleading records are strictly prohibited.

11. Compliance and Training

- a. Training and Awareness: EWU will provide regular seminars, discussions, and training sessions on anti-bribery and anti-corruption laws and this policy to ensure all employees, faculty, students, and associated individuals understand their responsibilities.

- b. **Monitoring and Auditing:** The university will regularly review and monitor compliance with this policy, including audits of financial records and operational procedures.

12. Consequences of Policy Violations

- a. **Disciplinary Actions:** Any individual found to violate this policy may face disciplinary actions, up to and including termination of employment, expulsion, or contract termination, as applicable. Such individuals may also be subject to legal action under the relevant laws, including the Penal Code 1860, the Prevention of Corruption Act 1947, and the Anti-Corruption Commission Act 2004.
- b. **Legal Ramifications:** Violators may be reported to the Anti-Corruption Commission or other relevant authorities for prosecution under applicable laws.

13. Continuous Improvement and Review

EWU will review this policy periodically to ensure it remains effective, relevant, and compliant with the latest legal requirements and best practices. Updates to the policy will be communicated to all stakeholders as necessary.

14. Contact Information

- a. For any inquiries, clarifications, or to report concerns, please contact [insert the contact information for the designated department or the office responsible].
- b. By enforcing this policy, East West University seeks to uphold its ethical standards, promote a culture of integrity, and ensure compliance with all relevant anti-bribery and anti-corruption laws in Bangladesh.

15. Circulation

This policy will be printed in English and Bangla and will be circulated for the information of all concerned.

Committee for the Anti-Bribery and Anti-Corruption Policy

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