

GEU/R-690-a/23

April 28, 2023

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Preamble:

Graphic Era Deemed to be University is committed to maintaining the highest standards of ethical conduct and integrity in all its operations. The University operates in compliance with applicable anti-bribery and anti-corruption laws and regulations in India and other jurisdictions where it conducts business. This policy is designed to prevent bribery, corruption, and unethical practices within the University and among its members, including employees, contractors, agents, vendors, consultants, and all individuals associated with the University.

Prohibition of Bribery and Corruption:

The University strictly prohibits all members of the University Community from engaging in any form of bribery, corruption, or unethical conduct. Bribery includes any direct or indirect offer, promise, authorization, or acceptance of anything of value, including cash or cash equivalents, to influence improperly any individual or entity for personal gain or to obtain an unfair advantage for the University or any other party.

Interaction with Public Officials:

The University acknowledges that interactions with public officials pose heightened risks for bribery and corruption. Hence, any dealings with public officials, including government employees and state-owned entity personnel, must be conducted with utmost transparency and in strict compliance with applicable laws and regulations. Approval from the appropriate authority within the University should be sought before any provision of gifts, benefits, or favors to or from public officials.

Providing and Receiving Gifts/Favors:

The provision and acceptance of gifts, favors, or benefits between members of the University Community and third parties must be reasonable, transparent, and in line with local customs and laws. Any gift or favor must not be intended to influence or reward any individual for unfair advantage or improper performance of their duties. Cash or cash equivalents as gifts or favors are strictly prohibited.

Facilitating Payments:

Facilitating payments, which are made to expedite routine governmental actions of non-discretionary nature, are not permissible unless legally mandated administrative fees for government services. Any such payment must be reported to the appropriate authority within the University.

Engaging Third Parties:

The University may be held responsible for the actions of third parties acting on its behalf. Therefore, before engaging any third party, a thorough due diligence process must be conducted to verify their reputation and commitment to ethical conduct. Contracts with third parties should include provisions ensuring compliance with this policy.

Compliance Training:

The University will provide regular compliance training and resources to all members of the University Community who interact with public officials or third parties. This training will focus on recognizing and preventing bribery and corruption.

Accounting Books and Records:

Accurate and reliable accounting records and internal controls are essential to prevent bribery and corruption. All transactions and business expenses must be properly recorded in accordance with applicable accounting standards and policies.

Reporting:

Any member of the University Community who suspects or becomes aware of any violation of this policy or anti-bribery laws must report it immediately through the designated reporting channels. Whistleblowers will be protected from retaliation.

Consequences of Violation:

Any violation of this policy will result in appropriate disciplinary action, up to and including termination of employment, expulsion from the University, or termination of business relationships with third parties. Violators may also be subject to civil and criminal penalties under applicable laws.

Policy Definitions:

"Bribery" refers to any offer, promise, authorization, or acceptance of something of value to improperly influence or gain an unfair advantage.

"Public Officials" includes government employees, state-owned entity personnel, and individuals acting in an official capacity for or on behalf of a government or public international organization.

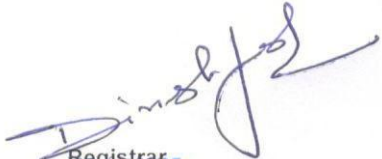
"Third Parties" refer to joint venture partners, agents, contractors, vendors, consultants, and any other external parties associated with the University.

This policy is applicable to all members of the University Community and will be communicated to all relevant stakeholders. The University is committed to reviewing and updating this policy periodically to ensure its effectiveness and compliance with changing laws and regulations.

Copy to:

PRO: For kind Information of the Hon'ble President

1. The Chancellor
2. Vice Chancellor
3. Finance Officer
4. Controller of Examinations
5. All Directors, Deans & HODs
6. Deputy Registrar Examinations
7. All Administrative Departments
8. Web Administrator for updating on the University website
9. File



Registrar
Graphic Era (Deemed to be University)
Dehradun