

Approved by Minutes No. 63/19 of the Academic Council dated 4 October 2019.

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY OF THE UNIVERSITY OF GEORGIA

1. Policy Statement

The University of Georgia is committed to conducting all its activities honestly, ethically, fairly and transparently. The University applies a zero-tolerance approach to bribery and corruption and complies with applicable Georgian legislation and recognized principles of responsible governance.

The purpose of this Policy is to define the University's position on bribery and corruption, establish the responsibilities of persons acting for or on behalf of the University, and provide guidance on preventing, identifying and reporting improper conduct.

2. Scope

This Policy applies to all employees, academic and visiting personnel, members of governing and advisory bodies, students acting on behalf of the University, interns, volunteers, consultants, contractors, suppliers, agents, partners and any other associated persons, regardless of their location.

3. Prohibited Conduct

No person covered by this Policy may directly or indirectly:

- offer, promise, give, request, agree to receive or accept a bribe or improper advantage;
- make or accept facilitation payments, kickbacks or unofficial payments;
- use University funds, property, information, position or authority for improper personal or third-party benefit;
- provide or accept gifts, hospitality, donations or benefits intended to influence a decision;
- conceal a conflict of interest, improper payment or corrupt activity;
- create false, incomplete or misleading financial or administrative records.

Reasonable and proportionate gifts or hospitality may be accepted or offered only where they are lawful, transparent, properly recorded and cannot reasonably be perceived as influencing an official, academic, procurement, employment or business decision.

4. Individual Responsibilities and Record-Keeping

All persons covered by this Policy must read, understand and comply with it, avoid conduct that may create an appearance of impropriety, disclose actual, potential or perceived conflicts of interest, and promptly report suspected violations.

All payments, expenses, gifts, hospitality, donations and transactions must have a legitimate purpose, be appropriately authorised and be recorded accurately and completely. Off-the-record accounts or transactions are prohibited.

5. Reporting and Protection

Concerns regarding suspected bribery or corruption must be reported promptly to the relevant line manager, the Internal Audit Office, the Human Capital Department or another officer designated by the University.

Reports will be handled promptly, impartially and, as far as reasonably possible, confidentially. No person who refuses to participate in bribery or reports a genuine concern in good faith may be subjected to retaliation, dismissal, disciplinary action, threats or other unfavourable treatment.

6. Breaches, Responsibility and Review

A breach of this Policy may result in disciplinary action, termination of employment or contractual relations, recovery of losses, referral to the relevant authorities or other measures permitted by law.

Managers and heads of organisational units are responsible for implementing this Policy within their areas. The designated policy owner will monitor its effectiveness, coordinate relevant communication and training, and review the Policy at least once every three years or earlier where required.

The structure reflects the University of London model, particularly its provisions on zero tolerance, scope, gifts and hospitality, facilitation payments, record-keeping, reporting, protection, institutional responsibility and periodic review.