

Anti-Bribery and Corruption Policy

Policy Review Date: 21/03/2025

Next Review Date: 21/03/2026

1. Introduction

The **Business School** upholds the highest standards of **integrity, financial responsibility, and transparency** and maintains a **zero-tolerance** stance towards **bribery and corruption**. The reputation of FSOB is built upon ethical conduct, accountability, and strict compliance with **anti-bribery regulations**.

To mitigate the risks associated with bribery, FSOB has implemented the following **proactive measures**:

- Establishing a **comprehensive anti-bribery strategy** aligned with the specific risks faced by the School.
- Ensuring that all employees, **associated persons** (i.e., individuals or entities providing services to or acting on behalf of the School), and external stakeholders with commercial links to FSOB are fully aware of, and compliant with, the School's **anti-bribery framework**.
- Providing **mandatory training** for employees on the risks and consequences of bribery to prevent both **active participation in, and passive exposure to, corrupt practices**.
- Offering **secure and confidential reporting mechanisms**, such as the **School's Public Interest Disclosure Procedures**, to encourage individuals to report any concerns regarding bribery without fear of reprisal.
- Conducting **thorough and impartial investigations** into any allegations of bribery in accordance with the School's **disciplinary procedures** and cooperating fully with law enforcement and regulatory bodies where criminal offences are suspected.
- Taking **swift, robust, and decisive** action against individuals found to be engaging in bribery, including **disciplinary sanctions, contract termination, and potential criminal prosecution**.

2. Scope of the Policy

This policy applies to all individuals engaged with FSOB, including but not limited to:

- **Employees, volunteers, interns, and temporary workers**
- **Consultants, contractors, and external service providers**

- **Board members and institutional representatives**

Every individual associated with the School is expected to uphold **the highest ethical standards**, demonstrating **honesty, integrity, and professional responsibility** in all business dealings. **Violations of this policy will result in severe disciplinary action**, which may include **dismissal and legal proceedings** where applicable.

3. Prohibited Conduct

Under no circumstances shall any FSOB employee or associated individual **offer, give, solicit, or accept** a bribe, whether directly or indirectly, in the course of conducting business on behalf of the School.

Bribery can take various forms, including but not limited to:

- **Cash payments**
- **Gifts or hospitality exceeding reasonable and lawful limits**
- **Undue favours or incentives**
- **Improper influence over business decisions, contracts, or regulatory matters**

Bribes may be given or received **by or from any individual**, regardless of whether they are a **public official, private individual, or corporate entity**, and irrespective of jurisdiction.

Any attempt to **secure an unlawful advantage** for the School, or to further **personal financial or professional interests** through corrupt means, is strictly prohibited.

4. Responsibilities and Reporting Obligations

All individuals subject to this policy must exercise **due diligence** in identifying and preventing bribery. If an individual has **reasonable suspicion** of bribery or corrupt conduct, they are obligated to report their concerns **immediately** through FSOB's **designated reporting channels**.

Failure to comply with this policy may result in **serious legal and reputational consequences** for both the individual and the School. FSOB remains committed to **ensuring compliance** with anti-bribery laws and fostering an organisational culture of **ethical responsibility and accountability**.