



## Anti-Corruption & Bribery Policy

### Introduction

Bethlehem Bible College, hereafter referred to as **BethBC**, is guided by three **main principles** related to anti-corruption and bribery:

1. **Anti-fraud and corruption:** BethBC refuses to support fraudulent actions directly or indirectly and undertakes to minimize risks of corruption in the implementation of its activities.
2. **Transparency and accountability:** BethBC commits to be fully accountable and transparent towards its beneficiaries, students, partners and donors, by providing access to information regarding the allocation and management of its funds. BethBC undertakes to have in hand all necessary tools to ensure the correct management of its operations.
3. **Professionalism:** BethBC bases its design, implementation, management and evaluation of programs and activities on high standards of professionalism, and capitalizes on its experience in order to maximize efficiency and resources.

The original anti-corruption and bribery policy is in English. Any other versions are available for translation purposes only. In case of discrepancy between the English and any other version of the policy, the English version prevails.

### Scope of application

This policy applies to all individuals working at all levels and grades, including senior leadership team (SLT), directors, officers and all employees (whether permanent, fixed-term or temporary), board members, students, consultants, contractors, trainees, volunteers, interns, sponsors, casual workers, self-employment workers working for BethBC, and all other persons associated with and acting for BethBC, whether directly or indirectly. This includes external members of BethBC committees, representatives, agents, subsidiaries, individuals appointed as consultants, contractors and partners.

## Policy Statement

1. At BethBC, it is our policy to conduct all of our business in an ethical manner and with honesty, integrity and fairness. Our values outline the standards and behaviors that BethBC upholds. By living our values, we can maintain the highest ethical standards in the conduct of our work, in accordance with state law.
2. BethBC takes a zero-tolerance approach to bribery and corruption. This type of conduct is absolutely prohibited whether committed by employees or anyone else acting on BethBC's behalf.
3. BethBC values its reputation for ethical behavior and recognizes that any involvement in bribery is illegal and will reflect adversely on its hard-earned image and reputation.
4. BethBC prohibits the offering, giving, soliciting, or acceptance of any bribe in whatever form to, or from, any person or company/organization (public or private) by anyone associated with BethBC.
5. BethBC expects any person or company/organization (public or private) associated with BethBC to act with integrity and without any actions that may be considered an offence with the meaning of bribery.
6. BethBC requires any potential breaches of this policy and bribery offers to be reported under BethBC reporting processes.
7. The prevention, detection and reporting of bribery is the responsibility of everyone associated with BethBC.
8. BethBC expects individuals to comply with this policy and they should be assured that no BethBC employee or associate will be penalized in the event that BethBC loses a contract or other interest as a result of refusing a bribe.
9. BethBC will ensure that all its employees, students, volunteers, and third parties that engage with BethBC are made aware and trained of this policy.
10. BethBC will develop a corruption response plan documenting how incidents will be investigated, reported and closed.
11. BethBC employees who commit a corrupt act, fail to report knowledge of corruption, or fail to manage the risk of corruption will be subject to disciplinary action up to and including termination of employment. Board members who fail to comply with this policy are subject to removal. Third parties who fail to comply with this policy will have their agreement and/or contracts with BethBC

terminated. BethBC may also seek restitution or prosecution or other legal remedies.

12. BethBC Board of Directors delegates the HR manager the responsibility and authority to develop policies as necessary to ensure the effective implementation of this policy. (Example: Whistle blowing policy).

## Purpose of this policy

### This policy aims at:

1. Improving the knowledge and understanding of everyone in and associated to BethBC, irrespective of their position, about the risk of fraud, bribery and corruption within the College, and its unacceptability.
2. Provide individuals with guidance as to how to report any suspicion of corruption, providing them with the suitable channels of communication and ensuring that all incidents of corruption and fraud are identified and addressed in an appropriate and timely manner and that sensitive information is treated appropriately.
3. Provide guidance about accepting gifts and hospitality.

## Definitions

**Corruption:** is a dishonest conduct that consists of seeking, soliciting, accepting or receiving – directly or indirectly- all unjustified payment, gift or benefit for having undertaken, or, alternatively, for having abstained from professional obligations. It is the abuse of entrusted power or influence for private gain.

**Bribery:** the offering, promising, giving, accepting or soliciting of money, gifts or other advantages in exchange for doing something illegal or breaching an employer's trust or seeking any kind of advantage whether personal or with BethBC.

**Fraud:** a range of illegal activities including but are not limited to:

- Theft of money, property or assets.
- Inappropriate use of assets.
- Submitting false expense claims.
- Undeclared conflicts of interest.
- Forging, tampering with or falsely creating documents or records.
- Destroying or removing documents or records.

- Knowingly creating or distributing false financial information or reports.
- Engaging in bribery or corruption.
- Deliberately ignoring or acquiescing in fraudulent activity.

## Who is responsible for the policy?

The Board of Directors of BethBC has overall responsibility for ensuring that this policy complies with BethBC legal and ethical obligations, and that all those under BethBC control comply with it.

The Director of Administration at BethBC along with the other SLT members have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy, and are given adequate and regular training on it.

## Gifts, hospitality and entertainment

1. This policy does not prohibit normal and appropriate gifts, entertainment and hospitality (given and received) to or from third parties. However, there are limited procedures required to allow for this.
2. The terms gift/hospitality/entertainment are not intended to refer to routine and inexpensive business breakfast/lunches or trivial/financially worthless material and promotional material such as stationery, ...etc.
3. Any gift/hospitality/entertainment offered to an employee must be notified to the line manager, where possible in advance, by e-mail.
4. Any gift/hospitality/entertainment given by an employee must be cleared with his/her manager, where possible in advance, and then marked clearly on the expenses form in the system so it is clear what it was and who it relates to.
5. Irrespective of the value of the gift/hospitality/entertainment, the employees ought to always ask him/herself the following questions: If the answer to any of these questions is YES or POSSIBLY then, he/she should always ask his/her line manager:

**Is the gift/hospitality/entertainment given or received:**

- A. With the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits.
  - B. In breach of local law.
  - C. In the name of the employee, not in BethBC name.
  - D. Made up of cash or cash equivalent (e.g. vouchers).
  - E. Inappropriate in terms of timing/value/type and justification.
  - F. Given secretly, not openly.
6. BethBC appreciates that the practice of giving business gift/hospitality/entertainment varies between countries and regions and what may be normal and acceptable in one country/region may not be in another. The test to be applied is whether in all the circumstances the gift/hospitality/entertainment is reasonable and justifiable. The intention behind the gift/hospitality/entertainment should always be considered.

**WHAT IS NOT ACCEPTABLE?**

It is NEVER acceptable for the employee (or someone on his/her behalf) to:

- A. Give, promise to give, or offer, a payment, gift, entertainment or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- B. Give, promise to give, or offer, a payment, gift, entertainment or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure.
- C. Accept a payment, gift, entertainment or hospitality from a third party if the employee knows or suspects that it is offered or provided with an expectation that a business advantage will be provided by BethBC in return.
- D. Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
- E. Engage in any activity that might lead to a breach of this policy.

## How to raise a concern?

It is required and encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If someone is unsure whether a particular act constitutes bribery or corruption or similar conduct, these should be raised with the HR manager at BethBC.

If someone wishes to raise a concern confidentially, he/she is encouraged to do so in accordance with BethBC Whistle blowing Policy.

## Monitoring and review

1. The Director of Administration along with the other SLT members will monitor the effectiveness and review of the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering corruption and bribery.
2. All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
3. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the HR manager at BethBC.
4. This policy does not form part of any contract of employment and BethBC may amend it at any time.

## Version control

<b>Version No.</b>	<b>Date</b>	<b>By (Name, position)</b>	<b>Details of changes</b>	<b>Reviewed and approved by (Name, position)</b>
1	11/1/2021	Dr. Jihan Twemeh Nazzal/ Director of Administration	N/A	Board of Directors on 12/1/2021

This policy was initially approved by BethBC Board of Directors on the 12<sup>th</sup> of January, 2021. It will be formally approved during the next board meeting.