

## Anti-Bribery Policy and Procedure

### 1. Introduction

The International Faculty CITY College is committed to applying the highest standards of conduct and integrity in its business activities in Greece and other locations of operations, and as such does not tolerate bribery.

### 2. Definition of Bribery

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company to induce or influence that individual or company to perform public or corporate functions or duties improperly. It applies to employees, officers, agents, consultants, workers, and any other persons or companies acting for or on behalf of the International Faculty or the University.

According to the Greek legislation, a bribe is an unfair benefit of any sort (financial or other) that is offered to, given to, promised or received by an individual who works or provides services in the private sector under any kind of contract (as an employee, under a work contract or as a freelancer), for themselves or for another individual, as a reward for improper performance of his duties.

### 3. Types of Bribery

There are four types of bribery related to the private sector:

1. Active bribery: promising, offering or giving a bribe, directly or indirectly (Article 396 par. 2 Criminal Code)
2. Passive bribery: requesting or accepting a bribe, directly or indirectly (Article 396 par. 1 Criminal Code)
3. Bribery of a foreign public official: it falls into the category of active bribery and is regulated in Article 236 par. 4 Criminal Code
4. Corporate offence of failure of a commercial organisation to prevent bribery: not stipulated in the Criminal Code, but there is a relevant provision in Article 18 Law 3560/2007.



#### **4. Key Principles**

1. Employees and others (officers, agents, consultants, or any other persons or companies) acting for or on behalf of the International Faculty and the University shall not make, solicit or receive any bribes or unauthorised payments.
2. The success of the International Faculty CITY College's anti-bribery approach depends on all employees and those acting for the International Faculty and the University playing their part in helping to detect and eradicate any potential for bribery.

#### **5. What constitutes improper performance**

Improper performance means to act against the legal interests of the employer, or against the law, or against by-laws or any other regulations of the employer, or against generally acknowledged principles in the society or area of transactions.

#### **6. Breaching the legislation**

The bribery offence provisions are found in the Greek Criminal Code, as mentioned above. The penalties for committing offences that constitute bribery include imprisonment and fines.

#### **7. Offences and High Risk areas**

There are four offences covered:

1. active bribery (offering, promising, or giving a bribe)
2. passive bribery (requesting, agreeing to receive, or accepting a bribe)
3. bribery of a foreign public official
4. corporate offence of failure of a commercial organisation to prevent bribery



The high risk areas for the International Faculty and the University have been identified as: large scale projects, tenders or longer term/high value contracts, gifts, hospitality and entertainment activities, donations, joint or collaborative ventures (including research programmes) and student recruitment in higher risk countries, significant use of third parties and agencies as intermediaries, dealings and negotiations with government officials or representatives of overseas partners, including license applications, concessions, planning consent, visas, tax and provision of utilities.

## **8. Examples of bribery**

Examples of bribery may include:

- Receiving financial or other benefits from students prior to the exam period
- Receiving financial or other benefits before any disciplinary action against a student or staff member
- Receiving financial or other benefits prior to accepting a PhD candidate
- Receiving financial or other benefits (including the use of acquaintances or political means) to achieve promotion or higher salary.

## **9. Accepting gifts and hospitality**

According to the existing legislation in Greece, there is no detailed description of what is allowable or not.

In the high risk areas cited in the Anti-bribery Policy, the employees, officers, agents, consultants, workers, and any other persons or companies acting for or on behalf of the International Faculty CITY College should always disclose to the management of the Faculty or the Head of the Department, any proposed gifts or other advantages or rewards for staff prior to receiving them.

Any gifts that are proportionately small and insignificant compared to the action which is expected to be performed can be considered allowable.



## **9. Process**

To report suspected Bribery offences you can follow the Whistle Blowing guidance at the [Public Interest Disclosure \(Whistleblowing\) Procedure](#)

## **11. Approval**

Approved by the CITY College Administration Board: March 1, 2020