

## **East European University**

### **Anti-Corruption Policy**

#### **I. Purpose**

1. The purpose of this Anti-Corruption Policy is to prevent, detect, and eliminate corruption, bribery, commercial bribery, trading in influence, and other dishonest practices at East European University, as well as to establish an anti-corruption culture.
2. The Policy ensures that the University's activities are characterized by:
  - transparency and integrity;
  - ethical conduct and legality;
  - institutional trust and accountability.

#### **II. Scope of Application**

1. The Policy applies to the University's:
  - academic and invited personnel;
  - administrative personnel;
  - students - to the extent they are involved in administrative, research, or financial processes;
  - contractors, suppliers, donors, and partners - within the framework of their relations with the University.
2. The Policy applies to all activities carried out on behalf of the University, including:
  - financial operations;
  - procurements;
  - investments;
  - receipt of donations and grants.

#### **III. Legal Basis**

The Policy is based on:

- international principles for combating corruption;
- standards of good governance and institutional ethics;
- principles of quality assurance in the European Higher Education Area (ESG), including requirements for governance, transparency, and accountability;
- the Law of Georgia on Combating Corruption, the University's Charter, and internal regulatory acts.

#### **IV. Key Definitions**

1. **Corruption** - abuse of authority for personal gain or the benefit of another person, with the aim of obtaining property or other advantages.
2. **Bribery** - offering, promising, giving, receiving, or soliciting money, securities, other property, property benefits, or any other undue advantage in order to influence a decision.
3. **Trading in influence** - using one's influence to obtain an undue advantage.
4. **Conflict of interest** - a situation where a person's private, financial, professional, or other interests conflict with the University's interests, actually or potentially affecting their official decisions or creating a risk of breaching impartiality.

#### **V. Core Principles**

The University is guided by the following principles:

- zero tolerance toward corruption;
- legality and ethical behavior;
- transparency and accountability;
- prevention of conflicts of interest;
- proportionate and fair response to violations;
- fair and equal treatment.

#### **VI. Prohibited Conduct**

The following is prohibited:

- offering, accepting, or facilitating money, securities, other property, property services, and/or other undue advantages;
- obtaining illegal or unethical benefits;
- using influence for personal or third-party benefit;

- making decisions in situations of conflict of interest;
- falsifying documentation or concealing information.

## **VII. Gifts and Hospitality**

1. Only the following are permitted:
  - gifts of symbolic value;
  - hospitality provided within the bounds of professional etiquette, which does not create a risk of conflict of interest or undue influence (including offering coffee, tea, or light meals during official meetings, work events, and academic activities).
2. Prohibited are:
  - gifts or services that exceed reasonable and moderate limits;
  - those that create expectations of influence, obligation, or advantage;
  - those related to influencing decision-making.
3. The maximum permissible value of a gift of symbolic value is determined by the University's internal regulations.

## **VIII. Management of Conflicts of Interest**

1. University employees are obliged to:
  - declare the existence of a conflict of interest;
  - refrain from participating in decision-making.
2. A conflict of interest exists when a person's private, financial, professional, or other interests may:
  - actually or potentially influence their official decisions;
  - create a risk of undermining the perception of impartiality or independence.
3. University personnel must declare in writing the existence or possible existence of a conflict of interest to their immediate supervisor and/or the Chair of the Ethics Commission no later than within 5 working days.
4. Failure to declare a conflict of interest is considered an ethical violation and entails disciplinary liability in accordance with the University's internal regulations.

## **IX. Reporting Violations**

1. Any person has the right to report, in good faith and based on reasonable suspicion, corruption or a violation of this Policy.
2. Reports may be made to:
  - the immediate supervisor;
  - the Quality Assurance Service;

- a confidential channel designated by the University.
- 3. The University ensures:
  - confidentiality;
  - protection against retaliation in cases of good-faith reports.

## **X. Monitoring and Reporting**

1. Compliance with the Policy is monitored by the Quality Assurance Service.
2. Identified risks and trends are reflected in:
  - internal reports;
  - institutional self-assessment documents.

## **XI. Violations and Sanctions**

1. Violations of the Policy entail liability in accordance with applicable legislation and the University's internal disciplinary rules.
2. Sanctions must be:
  - proportionate;
  - fair;
  - compliant with the law.

## **XII. Policy Review**

1. The Policy is subject to periodic review, but at least once every three years.
2. Amendments are approved by the Representative Council.
3. The updated version is published on the University's website.

## **XIII. Entry into Force**

1. This Policy enters into force on the date of its approval by the Representative Council.