



Policy Name : **Anti-Corruption and Bribery Policy**

Related Documents : MOHESR Outcome-based Evaluation Framework (OEF), ADEK Standards and Procedure for Higher Education Institutions in Abu Dhabi – 2023, ESG 2015 Standards.
ADSM P 212 – Faculty and Staff Discipline Policy
ADSM P 206 – Compensation and Benefits Policy

Section 1 : Purpose

- 1.1 This Policy establishes Abu Dhabi School of Management's commitment to prevent, prohibit, detect, and address bribery and corruption in all of its activities and relationships.
- 1.2 The purpose of this Policy is to ensure that ADSM conducts its affairs ethically, honestly, fairly, transparently, and in compliance with applicable laws and regulations.
- 1.3 This Policy outlines and explains the prohibitions against bribery and acts of corruption, and sets out the responsibilities of employees and associated third parties in preventing, reporting, and responding to misconduct.

Section 2 : Scope and applicability

- 2.1 This Policy applies to all ADSM employees, including faculty, staff, managers, and senior leadership.
- 2.2 This Policy also applies, where relevant, to any person or entity acting for, on behalf of, or in association with ADSM, including consultants, contractors, suppliers, service providers, agents, interns, temporary staff, and other third parties.
- 2.3 All persons and entities within the scope of this Policy are expected to comply with its requirements in all dealings related to ADSM.

Section 3 : Definitions

The following definitions apply to this policy:

- 3.1. **Bribery**: offering, promising, giving, requesting, soliciting, agreeing to receive, or accepting any financial or other advantage in order to improperly influence a decision, action, process, or outcome.
- 3.2. **Corruption**: the abuse of entrusted power, position, or authority for private gain or improper advantage.

- 3.3. **Facilitation payment:** any unofficial payment or benefit made to secure, speed up, or influence a routine action or administrative process.
- 3.4. **Gift or hospitality:** any item, benefit, service, entertainment, meal, travel, accommodation, or other advantage offered or received in a business context.
- 3.5. **Third party:** any external individual or organization with whom ADSM interacts, including suppliers, contractors, consultants, intermediaries, donors, and service providers.

Section 4 : Policy Statement

- 4.1 ADSM adopts a zero-tolerance approach to bribery and corruption.
- 4.2 ADSM is committed to conducting all of its affairs professionally, fairly, honestly, and with integrity in all academic, administrative, financial, procurement, regulatory, and external dealings.
- 4.3 ADSM prohibits bribery and corruption in any form, whether direct or indirect, and whether involving public officials, private individuals, or organizations.
- 4.4 No employee or third party acting on behalf of ADSM may engage in any act of bribery, corruption, kickbacks, improper commissions, facilitation payments, or other unethical inducements.

Section 5 : Exclusions

- 5.1 None.

Section 6 : Principles

- 1.1. This Policy does not apply standard and appropriate hospitality offered to or from third parties, if this does not influence ADSM activities, contravene UAE laws or given on behalf of a member of ADSM community for any of the purposes stated above.
- 1.2. Gifts
 - 6.2.1. ADSM allows the exchange of reasonable and justifiable gifts, if it is done within a business context, with clear intentions, as follows:
 - 6.2.1.1. It is not made to gain a business advantage by a third party.
 - 6.2.1.2. It is in compliance with the applicable UAE laws and regulations.
 - 6.2.1.3. It is given to ADSM and not as a personal gift to an employee.
 - 6.2.1.4. It is not a monetary gift (e.g. cash or vouchers).

- 6.2.1.5. It has an appropriate value and relates to an appropriate event or activity.
- 6.2.1.6. It is declared and disclosed with honesty and transparency.
- 6.2.1.7. If offered by or to an official entity, the President's approval is required.
- 6.2.2. ADSM employees may not accept or offer any gifts given in any of the following circumstances:
 - 6.2.2.1. In exchange for a business advantage (e.g. by a third party to be awarded a contract).
 - 6.2.2.2. Offered to an employee of an official entity to accelerate a process.
- 6.2.3. Violations may result in an investigation and may invoke the *Faculty and Staff Discipline Policy*.
- 6.2.4. Employees must declare and keep records of any form of gifts, including hospitality offered by third parties. The Human Resources Office may request reviewing such records and request evidence.
- 6.2.5. All maintained records and documents of gifts to third parties or received from all parties should be lodged with the President's Office Executive Secretary as official documentation and tamper-proof.
- 6.3. ADSM employees shall proactively support the School's stand in relation to bribery and corruption. Employees must report and avoid any incidents or situations which may result in possible bribery or any form of corruption.
- 6.4. Employees must report any suspected or anticipated violation of this Policy to their direct supervisor or to the Human Resources Office.
- 6.5. ADSM shall maintain accurate and up-to-date financial records for payments made to third parties. The School will establish suitable internal controls to ensure that the principles of this Policy are upheld.
- 6.6. Employees must follow the principles of the *Compensations and Benefits Policy* when submitting claims for expenses incurred to a third party.
- 6.7. ADSM shall maintain accurate and up-to-date records of all interactions with third parties. This includes maintaining documentation of contracts, invoices, etc.... ADSM shall not seek to conceal any payments.
- 6.8. Bribery: ADSM does not tolerate any form of Bribery, whether by a third part to an ADSM employee or vice versa. Employees must seek clarifications from the Human Resources Office, if needed.
- 6.9. Donations: ADSM may make donations for charitable causes as per the applicable UAE laws and regulations. This requires the prior approval of the Human Resources Office.
- 6.10. Reporting Violations
 - 6.10.1. ADSM employees must report any suspicious circumstance and/or behavior to the Human Resources Office. These include, but are not limited to:

- 6.10.2. Interacting with third party known for engaging in Bribery.
- 6.10.3. A third party insists on requesting commissions not within any signed contract.
- 6.10.4. A third party is not issuing invoices and/or receipts for payments.
- 6.10.5. A discrepancy in a third party's business address and billing address.
- 6.10.6. A third party requesting additional commissions or Gifts in exchange for services.
- 6.10.7. A third-party requesting payment to overlook potential violations.
- 6.10.8. A third party requesting verbal agreements.
- 6.10.9. Inappropriate fees compared to value of services rendered.
- 6.11. Violating the principles set in this Policy may invoke the *Faculty and Staff Discipline Policy*.

Section 7: Procedures

- 7.1 Employees must report any concerns related to suspected malpractice, Bribery or corruption, at the earliest stage possible to the Human Resources Office.
- 7.2 The Human Resources Office may form a committee to investigate the case.
 - 7.2.1 The committee must prepare a comprehensive report supported by evidence.
- 7.3 In case there is no evidence of any violation, there will be no actions taken.
- 7.4 In case the evidence is acquired of violation(s), further actions will be recommended by the committee in accordance with the *Faculty and Staff Discipline Policy*.

Section 8 : Responsibilities

- 8.1 The President shall cause this policy to be implemented.
- 8.2 The Human Resources Unit shall monitor implementation and report violations.

Section 9 : Cancellations

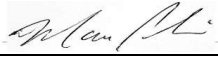
- 9.1 Approval of this Policy cancels P 509 – Anti-corruption and Bribery Policy_v7.0.

Section 10: Review Statement

- 10.1 ADSM's Policy Committee shall review this Policy at least annually. This Policy may be reviewed more frequently based on a request from the President, Policy Owner or in response to changes in applicable

regulations and standards. Reviewed policies shall be recommended and approved in accordance with ADSM's P 110 – Policy on Policies.

Section 11 : Approval

Authorization / Ownership	Signature and Date
Policy Owner: President	
Approved by: Executive Committee	Minutes of Meeting on 25/06/2026

Section 12 : Revision History

Revision No.	Effective Date	Description
0	06/04/2020	Policy first approved
1	05/04/2021	Annual review completed
2	06/09/2021	Mapping to ESG 2015 Standards completed.
3	04/07/2022	Review Statement updated.
4	10/07/2023	Annual review completed.
5	23/09/2024	Annual review completed.
6	07/11/2025	Annual review completed.
7	25/06/2026	Reviewed by IE Office for compliance.

Next scheduled review: 25/06/2027

END OF DOCUMENT