

## Anti-Bribery Policy

iheed<sup>+</sup>

accredited medical education online

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## iheed Anti-Bribery Policy

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## 1. Introduction

### 1.1 Purpose

iheed has a strict zero tolerance policy towards bribery and corruption. This policy sets forth the respective principles and rules and how they must be implemented.

### 1.2 Scope and Applicability

This Policy applies to all direct employees, tutors, academics or other persons engaged in contracts for service with iheed.

This Policy reflects the iheed standards for its Irish and United Arab Emirates offices. In some countries, more stringent applicable laws, regulations or industry codes supersede the principles set out in this Policy.

This Policy enters into force as of January 1, 2016, and must be implemented by all iheed affiliates (taking into account local legal considerations).

## 2. Principles and Rules

### Basic Rules

iheed staff and affiliates must not bribe and they must not use intermediaries, such as agents, consultants, advisers, distributors or any other business partners to commit acts of bribery.

iheed does not distinguish between public officials and private persons so far as bribery is concerned: bribery is not tolerated, regardless of the status of the recipient.

As an iheed staff member or affiliate, you must always consider before offering, giving, or promising anything of value to any person if what you are considering could be viewed as having an illegitimate purpose. If the answer is yes, you must not proceed.

If you are in any doubt, consult a member of the senior management team before proceeding.

## Definitions

**Bribery** means offering, giving or promising (or authorising someone to offer, give, or promise) an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behaviour of someone to obtain or retain a commercial advantage; or to have this done to you.

**Bribery** can take a variety of forms – offering or giving or receiving money or anything else of value. In fact, even common business practices or social activities, such as the provision of gifts and hospitality, can constitute bribes in some circumstances.

**Gifts** are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return. They include ‘courtesy gifts’, which are small gifts given at culturally recognised occasions (e.g., weddings, funerals) or special times of the year (e.g., Christmas, Ramadan, New Year).

**Grants and donations** are benefits given by iheed in the form of money and/or in-kind contributions (e.g., the supply of a programme placement for free or at a reduced price).

iheed provides grants and makes donations for a variety of legitimate purposes, including funding research or measures to improve health care systems and supporting access to education.

The main difference between grants and donations is that grants are given for a specific purpose (e.g., research or education) while donations address humanitarian needs, including emergency and natural disaster situations (e.g., earthquake).

**Facilitation payments** are payments to public officials to expedite the performance of duties of a non-discretionary nature. These payments are intended to influence only the timing of the public officials’ actions (e.g., payments to expedite the issuance of a visa or accreditation of a programme), but not their outcome.

**Hospitality** generally includes refreshments, meals, and accommodation. Entertainment generally includes attendance at plays, concerts, and sports events.

**Lobbying** describes interactions with policy makers and other external stakeholders with the intent to represent an iheed perspective in the policy making process. Active contribution to policy making is an integral part of the democratic process and a legitimate activity as it enables the representation of different societal interests.

**Sponsoring** is an agreement with a reputable institution or company under which the institution or company will, for payment, take measures to enhance the general image or reputation of iheed; e.g. sponsorship of a medical conference.

**Public Officials.** The term ‘public official’ has been extensively interpreted by regulators and includes

- Any elected or appointed officer or employee of a government or government department, government agency, or of a company owned or partially owned by a government
- Any elected or appointed officers or employees of public international organisations, such as the United Nations
- Any person acting in an official capacity for or on behalf of a government or a government department, government agency, or of a public international organisation
- Politicians and candidates for a political office
- Any other person who is considered to be a public official according to applicable laws, regulations and industry codes

- Medical and scientific personnel qualify as public officials when they work at a hospital, clinic, university or other similar facility owned or partially owned by a government. In some countries, doctors, pharmacists, clinical trials investigators, and nurses are public officials irrespective of whether they are working at a government institution.

## 2.2 Gifts, Hospitality, and Entertainment

### Principles and Rules

Gifts, hospitality, and entertainment must be modest, reasonable and infrequent so far as any individual recipient is concerned.

Gifts, hospitality, and entertainment must never be promised, offered, or provided with the intent of causing the recipient to do something favouring iheed or a partner institution, to reward such behaviour, or to refrain from doing something disadvantaging iheed or a partner institution.

Cash and gifts that are cash equivalent (e.g., shopping coupons) must never be given.

Do not provide entertainment to any participant to iheed business meetings, congresses or comparable events, unless the entertainment is an appropriate and incidental part of such events. Do not pay for any side or extended trips.

Do not pay for the entertainment, hospitality, or travel costs of anyone who accompanies an invitee to an iheed meeting, congress, workshop or comparable event.

Before providing hospitality, a gift of any sort or entertainment to anyone, consider whether the reputation of iheed, yourself, or the recipient is likely to be damaged if news of the hospitality, gift or entertainment appeared on the front page of a newspaper. If this would embarrass either iheed, a partner institution or the recipient, do not proceed.

## 2.3 Grants, Donations and Sponsoring

### Principles and Rules

Grants and donations may only be given if iheed does not receive (and is not perceived to receive) any tangible consideration in return. At the same time, grants and donations must never reward (or be perceived to reward) any tangible consideration.

Requests for grants or donations must be handled with special caution, in particular those from requesters who are able to affect the sale of iheed programmes or may benefit personally if the request is granted. For instance, grants or donations must not be given to obtain a marketing authorisation or any other approval, or to directly increase programme recruitment in return.

Sponsoring must not be used (or perceived to be used) to receive an improper commercial advantage in return. At the same time, sponsoring must never reward (or be perceived to reward) an improper commercial advantage.

Grants, donations, and sponsoring may not be provided to individuals.

## 2.4 Rules Relating to Public Officials

iheed does not distinguish between public officials and employees of private sector organisations so far as bribery is concerned; however, it is important to recognise that public officials are often subject to rules and restrictions that do not apply to persons who operate in the private sector.

Any relationship with public officials must be in strict compliance with the rules and regulations to which they are subject (i.e., any applicable rules or regulations in the particular country relating to public officials or that have been imposed by their employer) and any benefit conveyed to a public official must be fully transparent, properly documented, and accounted for.

## 2.6 Lobbying

iheed engages in lobbying activities to provide policy makers with data and insights to enable widely informed decision-making conducive to improving patient outcomes through the education of healthcare professionals.

Lobbying should not be misused for any corrupt or illegal purposes, or to improperly influence any decision. Lobbying should be conducted based on the values of transparency, honesty and integrity.

## 2.7 Facilitation Payments

iheed prohibits facilitation payments, irrespective of whether local law permits facilitation payments.

## 2.8 Third Parties

iheed must only engage Third Parties if all of the following requirements are met:

- There is a legitimate need for the services or the goods that they provide
- The services and goods are priced at no more than market value
- The Third Party is suitable from an anti-bribery perspective after assessment in a robust Due Diligence process
- There is a written contract or other written document with a similar legal effect (e.g., Purchase Order)

The receipt of services or goods must be documented and in line with the requirements stipulated in Section 2.9 of this Policy.

Engagement of Third Parties – including healthcare professionals – must never be used to create an incentive, or to reward or to secure any improper business advantage for iheed.

A Third Party is any natural person or legal entity with whom iheed interacts and who poses, due to the nature of their business, a particular level of bribery risk. iheed staff and faculty are not considered Third Parties in this Policy.

## 2.9 Books and Records/Internal Controls

iheed prepares and maintains books and records that accurately and in reasonable detail document the source and use of revenues and assets.

All relevant financial controls and approval procedures must be followed.

### **3. Implementation**

#### **3.1 Training**

All iheed staff and affiliates must familiarise themselves with this Policy and confirmation of understanding included in the annual appraisal process.

#### **3.2 Reporting Potential Misconduct/Non-Retaliation**

Any staff member or affiliate who learns of a potential violation of applicable laws or this Policy is required to report his or her suspicion to the Chief Operating Officer.

Persons who, based on good faith, report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliation.

#### **3.3 Breach of this Policy**

Breaches of this Policy will not be tolerated and can lead to disciplinary and other actions up to and including termination of employment.

#### **3.4 Exceptions**

No exceptions can be granted from compliance with applicable laws, regulations and industry codes.

The Chief Operating Officer together with the Chief Executive Officer decide on anti-bribery related matters not addressed by this Policy.

### **4. Responsibilities and Implementation**

It is the responsibility of every iheed manager to implement this Policy within his or her area of functional responsibility, lead by example, and provide guidance to the staff or affiliates reporting to him or her.

All staff members and affiliates are responsible for adhering to the principles and rules set out in this Policy.

The owner of this Anti-Bribery Policy is the Chief Operating Officer.