



Anti-Bribery Policy

1. Purpose

Pharos University in Alexandria (PUA) is committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all its operations. This Anti-Bribery Policy establishes clear guidelines to prevent, detect, and respond to bribery and corruption in compliance with Egyptian law and international best practices.

2. Scope

This policy applies to all PUA employees, faculty members, administrative staff, students, contractors, suppliers, and any third parties acting on behalf of the University.

3. Definition of Bribery

Bribery involves offering, giving, receiving, or soliciting any undue advantage (financial or non-financial) to influence decisions or actions improperly. This includes but is not limited to:

- Cash payments, gifts, or hospitality intended to secure unfair advantages.
- Facilitation payments ("speed money") to expedite routine processes.
- Kickbacks, commissions, or donations intended to influence decisions.
- Any other form of improper inducement.

4. Prohibited Conduct

PUA strictly prohibits:

- Direct or indirect bribery in any form.
- Soliciting or accepting bribes for personal or institutional gain.
- Using intermediaries or third parties to circumvent anti-bribery laws.
- Falsifying records to conceal corrupt practices.

5. Gifts, Hospitality, and Expenses

- **Gifts & Hospitality:** Must be modest, infrequent, and not influence decision-making. Excessive gifts must be reported.
- **Expenses:** Must be transparent, properly documented, and for legitimate business purposes.

6. Reporting Violations (Whistleblowing)

- Employees and stakeholders must report suspected bribery via PUA's confidential reporting channels.
- Reports can be submitted anonymously through the designated email (ethics@pua.edu.eg).
- Retaliation against whistleblowers is strictly prohibited.

7. Responsibilities & Compliance

- **University Leadership:** Ensures policy enforcement and fosters an anti-corruption culture.
- **Employees & Faculty:** Must comply, undergo training, and report violations.
- **Third Parties:** Contractors and partners must adhere to this policy.

8. Training & Awareness

- Mandatory anti-bribery training for all staff and relevant stakeholders.
- Regular updates on legal requirements and ethical standards.

9. Disciplinary Actions

Violations will result in disciplinary measures, including termination, legal action, and reporting to authorities.

10. Policy Review

This policy will be reviewed biennially to ensure compliance with evolving laws and standards.



Endorsement

M. M. Mohyeldin

Prof. Mahmoud Mohy El Din
Pharos University President