



## **Anti-bribery and corruption policy**

This anti-bribery policy exists to set out the responsibilities of The European Academy of Coptic Heritage and those who work for it with regards to observing and upholding TEACH zero-tolerance position on bribery and corruption.

Being regulated under ICO. With reference number ZB132659, TEACH is committed to uphold all laws related to anti-bribery and corruption of UK.

As a UK registered charity (charity no. 1176827) the Trust remains bound by the laws of the UK, including the Bribery Act 2010 (the "Act"), with respect to its activities, both at home and abroad. It undertakes due diligence on its partners, grant recipients, and associates and takes reasonable steps to ensure that they implement all applicable anti-bribery and anti-corruption laws.

### **Anti-Corruption policy:**

Corruption is the misuse of public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

As part of our commitment to fight corruption, TEACH will conduct proper due diligence on all donors. TEACH will review all donations against its AB&C standards and will not accept Charitable donations that carry risk of being a conduit for corrupt payments, e.g. a government official in negotiations with a business may disclose that they are on the board of TEACH and request a donation made to the charity.

Any donation with the intention of influencing someone to act improperly, or as a reward for acting improperly will be rejected and reported to the concerned authorities.

### **Gifting policy:**

The principal guide in providing or receiving Gifts/Favors is a rule of reasonableness. These practices vary among cultures and what may be normal or acceptable in one culture may not be normal or acceptable in another. Members of TEACH should always consider whether a Gift/Favor is reasonable and justifiable, considering all relevant circumstances, including the intentions of the parties and whether they or their colleagues would be comfortable seeing the Gift/Favor reported publicly.

A Gift/Favor that is not directly or indirectly provided to or received from a Public Official is generally permitted given that:

1. It does not include cash or a cash-equivalent (e.g., gift certificates, vouchers, or other items that can be readily exchanged for cash);
2. It is unsolicited, given infrequently, and given openly, not secretly;
3. It is of an appropriate type and value, given at an appropriate time, taking into account the motive, local custom and laws, and the rules of the employer of the Third Party making or receiving the Gift/Favor.

#### Dealing with third parties:

TEACH may be held liable for the actions of Third Parties acting for or on its behalf. Thus, Third Parties may not engage in activities in which a member of the Academy may not engage when acting for or on TEACH's behalf. To minimize the risk of potential liability resulting from the acts of others, a Third Party may only be engaged after TEACH performs due diligence to verify that the Third Party is reputable and committed to operating in an ethical and legally compliant manner. Where appropriate based on an assessment of risk, this policy will be communicated to Third Parties and appropriate contractual arrangements will be implemented to ensure compliance by such Third Parties.