

Pursuant to Article 9 of the Statute of Algebra University and in accordance with the Act on Higher Education and Scientific Activity, the Senate of Algebra University enacted at its 4<sup>th</sup> session, held on 26<sup>th</sup> March 2024, the following

## **POLICY ON ANTI-BRIBERY AND ANTI-CORRUPTION OF ALGEBRA UNIVERSITY**

Bribery and fraud are criminal offences under Croatian laws. They are activities that divert money and resources towards the personal gain of a few, often to the cost and detriment of the many. Croatian Anti-Corruption Strategy for the period 2021-2030 has defined several measures to combat bribery, fraud and corruption in higher education and research, most of them in relation to a transparent and sound management of public funds at higher education institutions, including measures against plagiarism and nepotism in recruitment as well as activities of promoting academic values in general.

As a private higher education institution, our financial responsibility lies primarily towards our students who invested their resources and their trust in education provided by Algebra University. Moreover, as a higher education institution with public responsibility, we are committed to guard and nurture fundamental academic values aiming for the advancement of learning for the wider societal benefit.

Algebra University's Policy on Anti-Bribery and Anti-Corruption is rooted in the overarching European policies on academic integrity, understood as compliance with ethical and professional principles, standards and practices by individuals and higher education institutions and referred to in the Paris Ministerial Communiqué (2018), together with other fundamental values like academic freedom, institutional autonomy and public responsibility of and for higher education referred to in the "Statement on Academic Freedom" as the Annex I to the Rome Ministerial Communiqué (2020).

Personal and institutional responsibility for the education and welfare of students, staff and of the community at large is reflected in our commitment to high professional standards in education and research. Unethical activities of bribery, fraud and corruption are not tolerated at all and we are committed to protect our staff and students from any damage associated with bribery and other corrupt activity.

Staff and associated persons of Algebra University are expected to act at all times in a manner that is fair, impartial and without favouritism or bias, to conduct all activities to the highest standards of integrity, commitment to the fundamental values of honesty, trust, fairness, respect, responsibility and courage and to ensure that there can be no suspicion or appearance of corruption.

Algebra University has zero tolerance towards actions such as seeking a financial or other advantage through bribery for any purpose that is a financial or other advantage with the intention to induce or reward improper performance. This includes active bribery such as offering, promising or giving of a bribe as well as passive bribery that is requesting, agreeing to receive or accepting of a bribe.

Other inappropriate ways of conduct include acting with a conflict of interest, quid pro quo, favourism, authority pressure, fabrication or falsification of research results, financial irregularities, sexual or other types of harassment and misconduct with students, colleagues or other members of the academic community or corruption of the educational process such as by falsifying grades, diplomas or degrees in return for money, sexual or other favours or by demanding sexual, financial or other material favours from subordinate employees or colleagues in return for continuing employment.

Academic misconduct related to students include plagiarism and failures of correct acknowledgement practice, contract cheating or paying for a third party to prepare an assignment, submitting for assessment of review work prepared by a third party, fraud by making false representation, fraud by failing to disclose information, fraud by abuse of position, collusion between students such as unauthorised collaboration in preparation or presentation of work, allowing personal work to be copied by others, cheating in examinations and other assessment tasks, using forged or altered certificates or transcripts, e.g. false academic qualifications of authentic higher education institutions from diploma mills, offering bribes for admission or for grades, fabrication or falsification of information or student identity.

Individuals who reasonably suspect the occurrence of bribery, corruption or other academic misconduct should report their concerns to Algebra University's Ethics Committee, providing a brief description of the alleged irregularity and any evidence that supports the allegations or irregularity and identifies the individual or individuals responsible. Any report will be treated as a disclosure (whistleblowing).

Algebra University's Ethics Committee will investigate the concerns, establishing and securing evidence necessary for criminal and disciplinary action against those responsible and notify the police and other relevant authorities if appropriate, and sanction such wrongdoings immediately. All persons involved with the investigation must treat the information in strict confidence. An unwarranted breach of confidence may be the subject of disciplinary action.

Any member of staff or student suspected of bribery may be suspended pending a full investigation. Individuals suspended as a result of a suspected bribery need to be informed of the reason for the suspension and of any other outcome of investigation.

In cases which involve or may involve students, Algebra University's Students Union will be informed at the outset of the investigation. If a student is the subject of an allegation of bribery, this will be dealt with under the disciplinary procedures applicable to students.

Algebra University's Ethics Committee will prepare a report of their investigation containing a description of the allegations and the steps taken to investigate them, a conclusion as to whether the allegations made had substance, a description of any steps taken in relation to the

individual or individuals concerned together with recommendations as to any disciplinary action, and the measures taken to minimise the risk of a recurrence. Algebra University's Ethics Committee shall maintain evidence of such reports and use them to analyse and improve the Policy on Anti-Bribery and Anti-Corruption.

Algebra University's Ethics Committee is responsible for ensuring that this Policy is implemented and maintained. It shall be made generally available and published publicly via the University website. Heads of units are responsible for ensuring that staff within their divisions, departments or sections, students and other associated persons are made aware of this Policy.

This Policy interacts with the Code of Ethics of Algebra University.

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