

## Policy Against Bribery and Corruption for the Swedish Research Institute in Istanbul - SRII

### A. Background and purpose

1. The SRII is committed to ensure that high standards of integrity apply in all of its areas of operation and that all of its business is conducted in an honest and transparent manner. As a research establishment deriving a significant proportion of its income from public funds as well as private and public funding agencies, the SRII is concerned to protect itself and its funders, donors, employees, and students from the detriment associated with **bribery** and other corrupt activity. It is therefore committed to preventing **bribery** and **fraud** by staff and any third party performing services for or on behalf of the SRII. To ensure that corrupt conduct does not gain a foothold, the system of internal controls must be well-considered and be applied as intended to protect staff against unfounded accusations of corruption.

2. The SRII recognizes that the risk of **bribery** and **fraud** will arise in various contexts and will seek to advise, inform, and/or train its employees appropriately to assess the risk of **bribery** and **fraud** being practised and implement practices which reduce the risk of it occurring or being undetected where existing processes are not already in place.

3. The Board of Trustees shall oversee the implementation of this policy, provide advice as necessary, and monitor and report on breaches of policy, and the general application of the policy.

4. The purpose of this policy is to assist those working for or on behalf of the SRII by:

(a) setting out their responsibilities in observing and upholding the SRII's position on **bribery** and **fraud**; and

(b) providing information and guidance on how to recognize and deal with **bribery** and **fraud** issues.

5. **Bribery** and **fraud** are punishable for individuals. If the SRII is found to have taken part in corruption it could face an unlimited fine, be excluded from research funding, and face damage to its reputation. The SRII therefore takes its legal responsibilities very seriously.

6. This policy has been adopted by the SRII Board of Trustees and applies throughout the SRII.

### B. Application of the policy

8. This policy applies to all **'staff'**, meaning all individuals working within the SRII at all levels and grades (whether permanent, fixed term, or temporary, or any other person working in any context within the institution.

9. This policy also applies to **'associated persons'**, meaning any individual or organization performing services for and on behalf of the SRII, which may include the recipients of grants, partners in collaborative working arrangements and joint ventures, suppliers, distributors, business contacts, agents, advisers, and government and public bodies.

### C. Statement of policy

10. The SRII will take appropriate action to prevent **bribery** and all forms of **fraud**

in the SRII.

11. No member of **staff** or **associated person** shall seek a financial or other advantage for the SRII through **bribery**. No member of **staff** or **associated person** shall offer, promise, give, request, agree to receive, or accept a **bribe** for any purpose.

12. The SRII prohibits any form of **fraud** within its operations, and no SRII **staff** or **associated persons** may engage in any form of **fraud** with regard to activity carried out within or on behalf of the SRII.

13. SRII **staff** who suspect that **bribery** or **fraud** has occurred are required to report such instances to the Board of Trustees and the Director. The matter will be appropriately investigated, recorded, and reported in accordance. The Board of Trustees shall be responsible under this policy for monitoring and recording instances of **bribery** or **fraud**.

14. **Bribery** and **fraud** by **staff** will be treated as a serious disciplinary offence resulting, potentially, in dismissal and legal action.

15. Particular attention should be kept in relation to areas of activity where it is considered that the risk of **bribery** and **fraud** is particularly high, namely: •Donations, •Hospitality and entertainment, •Facilitation payments

(a) The dividing line between what is “proper” and “improper” is fluid and can vary with time and between different areas of activity. In general, the more your position can be perceived to influence the finances or general situation of the gift giver, the more restrictive you must be when it comes to gifts or the equivalent and it is necessary to set restrictive limits to what is proper to accept.

(b) It is necessary to maintain a respectful distance to what is considered beyond proper limits. Gifts of minor value can be accepted. For more valuable gifts they can be accepted on behalf of the SRII and is appropriate entered in an inventory list. Concerning consumer goods, the gift can be shared by the entire staff. Cash or similar gifts, however, may never be accepted.

#### D. Implementation

16. Responsibility for implementation of this policy lies with the Board of Trustees.

17. The commitment by the SRII to preventing **bribery** and **fraud** shall be clearly and regularly communicated to **staff** and **associated persons** through processes to be instituted by the Board of Trustees.

18. The nature and extent of the risks relating to **bribery** and **fraud** to which the SRII is exposed shall be assessed by the Audit Committee at least annually and appropriate changes to this or other policies shall be implemented to reflect the outcomes of such risk assessments.

19. **Staff** and **associated persons** are encouraged to undertake risk assessments where they consider that there is a risk that **bribery** and/or **fraud** might occur in relation to a particular transaction, third party, or territory, and to undertake appropriate due diligence prior to proceeding.

20. This policy shall be available to every member of **staff**. The SRII’s prohibition of **bribery** and **fraud** shall be communicated to all suppliers, contractors, and business partners at the outset of any business relationship with them and as appropriate

thereafter.

21. The SRII's procedures to prevent **bribery** and **fraud** through this and other policies shall be monitored and reviewed by the Board of Trustees at least every three years to assess their suitability, adequacy, and effectiveness. This policy may be amended from time to time to reflect legal requirements or best practice recommendations and in the light of any instances of **bribery** and **fraud**.

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Head, SRII Board of Trustees