

Anti-Bribery and Corruption Policy

1. Introduction

O.P. Jindal Global University (JGU) is dedicated to upholding the highest standards of integrity, transparency, and ethical conduct across all academic, administrative, financial, and stakeholder engagements. JGU maintains a zero-tolerance approach to bribery and corruption and is firmly committed to combating such practices in alignment with Indian law, including the Prevention of Corruption Act, 1988.

This policy establishes a structured and time-bound approach to strengthening anti-bribery systems across governance, procurement, financial controls, training, reporting mechanisms, third-party engagement, and institutional accountability. It applies to all faculty, staff, students, administrators, contractors, vendors, consultants, and other third-party stakeholders associated with JGU.

2. Policy Objectives

- **Cultivating a Culture of Integrity:** Foster a university-wide culture of honesty, accountability, and ethical decision-making in all institutional activities.
- **Preventing Bribery and Corruption:** Prohibit the offering, soliciting, giving, or accepting of any improper advantage, including cash payments, gifts, favors, hospitality, or special treatment intended to influence decision-making.
- **Strengthening Transparent Systems:** Ensure that institutional transactions, approvals, procurement, admissions, recruitment, and partnerships are conducted through official and documented channels.
- **Empowering Safe Reporting:** Promote confidential and responsible reporting of suspected bribery, corruption, conflicts of interest, or unethical conduct without fear of retaliation.
- **Continuous Improvement and Accountability:** Establish a data-driven and review-based compliance framework to assess risks, strengthen controls, and align with evolving legal and institutional standards.

3. Targeted Goals and Timeline

| Focus Area | Target | Year-wise Goals |
|------------------------------------|---|---|
| Governance & Leadership | Build a strong anti-bribery governance framework. | 2024: Constitute an Anti-Bribery and Ethical Compliance Oversight Committee under the university's compliance framework. 2025: Strengthen the role of the Chief Compliance Officer in supervising anti-bribery implementation and institutional risk review. 2026: Develop and adopt a university-wide Anti-Bribery and Corruption implementation protocol. 2027: Conduct an independent review of governance effectiveness and compliance gaps. 2028: Fully integrate anti-bribery safeguards into JGU's governance and decision-making systems. |

| Focus Area | Target | Year-wise Goals |
|--|---|---|
| Procurement, Finance & Third-Party Engagement | Ensure transparent and accountable dealings with vendors, suppliers, consultants, and partners. | 2024: Require official, documented channels for all external transactions and approvals. 2025: Introduce anti-bribery declarations and due diligence checks for key vendors and partners. 2026: Standardize financial and procurement controls to reduce bribery risk in contracting and payments. 2027: Audit procurement and third-party engagement practices for compliance refinement. 2028: Embed anti-bribery clauses in all major contracts, partnerships, and service agreements. |
| Awareness, Training & Capacity Building | Build anti-bribery awareness across the JGU community. | 2024: Launch foundational awareness campaigns on bribery, corruption, and ethical conduct. 2025: Introduce structured ethics and anti-bribery training for faculty, staff, and administrative units. 2026: Expand periodic refresher training for students, leadership teams, and high-risk departments. 2027: Assess training participation and effectiveness through compliance reviews. 2028: Institutionalize annual anti-bribery certification and awareness programmes across the university. |
| Reporting, Whistleblowing & Response | Strengthen safe reporting and fair investigation systems. | 2024: Establish clear reporting channels for suspected bribery and unethical conduct. 2025: Create confidential case-handling procedures with protection against retaliation. 2026: Develop standard protocols for inquiry, escalation, documentation, and disciplinary response. 2027: Review trends in complaints and response timelines to strengthen trust in the system. 2028: Align reporting and response mechanisms with global best practices in higher education compliance. |
| Conflict of Interest & Ethical Conduct | Prevent improper influence in academic, administrative, financial, and research decisions. | 2024: Develop disclosure norms for conflicts of interest in recruitment, procurement, admissions, finance, and partnerships. 2025: Introduce annual declarations for key decision-makers and relevant officials. 2026: Integrate conflict-of-interest review into committee processes and institutional approvals. 2027: Conduct periodic internal checks on disclosure compliance. 2028: Mainstream conflict-of-interest safeguards across university operations and policy reviews. |
| Monitoring, Evaluation & Accountability | Implement a measurable and transparent compliance review system. | 2024: Develop anti-bribery compliance indicators and a risk-monitoring framework. 2025: Publish an annual ethical compliance and anti-bribery update. 2026: Integrate compliance responsibilities into administrative performance review systems where relevant. 2027: Commission an external audit or review of anti-bribery initiatives. 2028: Align compliance reporting with institutional best practices for transparency and accountability. |

Additional Initiatives: Establish an Anti-Bribery Declaration Framework for employees and third parties in sensitive functions; introduce risk-based compliance screening for high-value transactions; and create periodic ethics communication campaigns reinforcing JGU’s zero-tolerance stance on bribery and corruption.

4. Implementation and Review

- The Anti-Bribery and Ethical Compliance Oversight Committee, working in coordination with the Chief Compliance Officer, will oversee policy execution and support institution-wide adherence to the initiatives outlined above.
- Regular stakeholder consultations and compliance reviews will be conducted to refine controls, strengthen awareness, and respond to emerging risks in university operations.
- Annual reviews will assess policy effectiveness, with revisions introduced as required to maintain legal compliance, institutional integrity, and operational transparency.
- By enacting this policy, JGU reaffirms its commitment to a transparent, accountable, and corruption-free academic environment that reflects its core values and ethical governance standards.