

Dear Associates and Colleagues,

The University of Patras Special Account for Research Funds recognises that bribery does not only constitute a significant threat for society as a whole, as well as every organisation in the public and private sectors.

We have an obligation towards the University community, society, employees, our associates, the Administrative Authorities, and generally all the bodies that constitute the Public Administration, to operate with integrity throughout the entire range of our activities and to communicate our expectations for reducing the risk of corruption.

We have adopted the “zero tolerance” policy on matters of bribery, corruption, facilitation payments or any whatsoever other illegal act and are committed to operating in accordance with the requirements of the applicable legislation and the requirements of the Anti-Bribery Management System in accordance with the special standard ISO 37001.

It is very important that you comprehend and implement everything that is stated in this Policy, which designates our anti-bribery requirements in order:

- to ensure that project management is effective, efficient and transparent;
- to protect our reputation;
- to act in accordance with our values and culture; and
- to comply with the requirements of the applicable legislation, our contractual responsibilities with respect to the Administrative Authorities and the requirements under the Anti-Bribery System of the University of Patras Special Account for Research Funds.

It is your responsibility to read and understand this Policy. Any whatsoever person who violates the requirements of the Policy and/or legislation in relation to bribery shall be subject to appropriate disciplinary action and/or criminal prosecution. You are also vested with the responsibility to report actions or incidents, where you believe that these violate this Policy's requirements.

Yours sincerely,

Affected people - Who is affected?

The requirements of the Policy relate to the members of the Research Committee, the participants in Committees and Bodies of the University of Patras Special Account for Research Funds (hereinafter known as "ELKE"), the employees (regardless of job position, length of period of employment), the associates/suppliers and every other legal entity that is related to the ELKE.

What is bribery?

Bribery is the offer, promise, provision, acceptance or solicitation of an unjustified benefit of any (financial or non-financial) whatsoever value, which is made directly or indirectly in violation of the applicable law, as an inducement or reward to a person that is acting or omitting to act in connection with that person performing duties.

Bribery also constitutes the request or acceptance of a benefit advantage of any whatsoever nature that is not due, or the acceptance of the promise of such an advantage.

Bribery may be of any whatsoever nature, such as: payments in money or in kind, bogus employment or "consulting" relationship, political contributions, sponsorships and donations, gifts, travel, hospitality, reimbursement of expenses. It does not matter whether:

- the bribe is given directly or through a third party; or
- it is given for the benefit of the recipient or another person.

A bribe may be of a financial or non-financial nature and may include the provision or receipt of money, loans, contributions or gifts, travel, offers of employment, rebates, discounts, goods, services or anything else that may be considered to be of value. Gifts or entertainment can be considered as forms of bribery under certain circumstances. A bribe may also take the form of a "reward" and be remitted after the improper performance of the relevant duty or obligation has been completed.

There must not be any involvement in any case of bribery. For this reason, it shall not be acceptable under any circumstances to accept, offer, promise any whatsoever item of value, any whatsoever financial or other advantage to or from any whatsoever person that could influence ELKE's activities.

Special attention must be demonstrated in cases of family members, relatives or persons who are related to public officials and/or politicians.

Gifts

It is not permitted to provide gifts (of any whatsoever nature) directly or indirectly, to a person in exchange for any whatsoever advantage, influence of action or decision, favourable treatment or the exercise of influence for the benefit of the ELKE. Exceptions are accepted in relation to gifts based upon etiquette.

The receipt of gifts shall only be permitted where the relationship is equidistant. Gifts whose value exceeds 100 Euros shall be defined as excessive and are not acceptable.

The extent to which the gift that shall be received may be considered to be excessive or inappropriate or may entail or imply the assumption of any whatsoever obligation must also be considered. It is not permitted to accept gifts in the form of cash (of any whatsoever value) under any circumstances. It is not permitted under any circumstances to solicit gifts from a supplier.

Meals, hospitality, travel, entertainment

Meals and entertainment that are provided by suppliers shall only be permitted where a relation of equidistance is observed. The extent to which the meal or entertainment that shall be received may be considered to be excessive or improper or may entail or imply the assumption of any whatsoever obligation must also be considered. The provision of meals or entertainment activities must not be requested under any circumstances.

The provision of meals and hospitality by the ELKE to third parties shall be permitted, only where it is provided on a non-regular basis and only in suitable circumstances. Their value must in every case be reasonable and only serve legitimate purposes.

The receipts for the payment of meals and hospitality shall be governed by project management rules in accordance with the Funding Guide, as it shall be applicable on each occasion. The ELKE shall not under any circumstances remit or reimburse travel expenses to persons, where this provision could be considered as a bribe.

Charitable donations, sponsorships, grants, scholarships

The ELKE does not undertake charitable donations, sponsorships and grants to organisations / associations / companies and natural persons.

It grants scholarships through the implementation of specific actions and/or projects. The scholarships are covered either by ELKE reserves, or by resources of self-financed programmes, or by funding of research and/or development programs, or by sponsorships, or by donations of legal or natural persons. The conditions for awarding scholarships, the selection of persons and the restrictions are in every case stipulated in the Funding Guide, as well as the scholarship invitations.

The ELKE is able to receive sponsorships and donations from third parties in accordance with the provisions in the current legislation and the Funding Guide. In every such case, and prior to acceptance, the ELKE shall conduct due diligence regarding the risk of bribery. Sponsorships and donations that involve the risk of bribery shall not be accepted under any circumstances.

Political donations

Donations to political parties, political party officials and candidates for political office are not permitted at any whatsoever level.

Cooperation with third parties

The ELKE may be considered to be responsible for acts of bribery to third parties, who are acting on its behalf, or for acts of bribery of employees or other persons who are performing services for the ELKE.

It shall not be permitted nor requested from any whatsoever third party to bribe any whatsoever person or accept a bribe from any whatsoever person. Furthermore, processes by third parties that are acting on behalf of the ELKE, which processes may be in conflict with this Policy, must not be overlooked.

Recruitment of personnel

During the recruitment of a new employee, due diligence must be carried out in order to determine to the extent to which it is feasible for a new employee to be in a position of being bribed or bribing. There must not be any recruitment of new employees under any circumstances where there is a suspicion that this person may attempt to bribe or be bribed.

The participants on the Committee Evaluating the ELKE new candidate employees undertake that they are not related to the candidates.

Staff remuneration system

The personnel remuneration is designated in contracts. In the cases where the ELKE shall grant remuneration in excess of the agreed upon amount, the reason shall be exclusively related to the employee's additional employment in a specific objective.

Inspections by government agencies and other bodies

It is not permitted to make payments or provide benefits of any whatsoever other advantage to public servants and inspectors in order to avoid an inspection/audit, to assign the management of a new project, to influence the outcome of an inspection/audit or to avoid a fine/reduce expenditure.

Money laundering

The actions of money laundering from illegal activities are contrary to the principles and values that govern the ELKE.

The ELKE complies with all the laws and regulations that are related to money laundering from illegal activities and acknowledges that it has a responsibility to report any suspicious behaviour to the competent Greek authorities.

Conflict of interests

Every employee or Committee member of the ELKE within the context of avoiding conflict of interest cases is required:

- To immediately report any whatsoever interests of its own or of its relatives that may create a conflict with the interests of the ELKE or hinder it in the proper performance of its duties or influence its decisions;
 - To disclose any whatsoever relationship with suppliers, prospective personnel or prospective scholarship candidate in order to avoid a possible/potential conflict of interest.
 - To not create joint or mutual financial interests with suppliers of the ELKE, since this creates a risk of conflict of interest;

- To not lend or borrow amounts of money from the ELKE's suppliers;
- To treat suppliers objectively by avoiding the favourable treatment of certain persons or discouraging cooperation with other suppliers without a valid objective reason.
- To not to take advantage of its position in order to secure advantages or other benefits for itself or its relatives from a supplier, candidate personnel or prospective scholarship recipients.
- To report where it is related to or has commercial connections with public officials or suppliers that are related to the duties assigned to the employee by the ELKE or political figures.

The hereinabove notifications / reports by the employee shall not only be made during recruitment but also every time that there is a change.

Suppliers and associates

The suppliers/associates of the ELKE are not permitted to directly or indirectly carry out, promise, or authorise the unfair remittance of money or the provision of any whatsoever goods of value to persons in order to lead them to taking any whatsoever action or make a decision in order to obtain benefit.

They must comprehend and comply with the requirements of anti-bribery legislation when carrying out their ELKE-related activities.

In the case where a supplier/associate or someone who is acting on behalf of the ELKE, receives or becomes aware of a request or demand for a bribe in connection with work for the ELKE, they should immediately report it to the ELKE Anti-Bribery Committee before taking further action.

The nature, type and extent of the due diligence that is carried out for suppliers and associates of the ELKE prior to entering into agreements shall depend upon the potential of the risk for bribery.

The manner for selecting suppliers/associates, signing contracts and monitoring their performance is stipulated in the applicable legislation and in the Procurement Regulation of the ELKE, as it shall apply on each occasion.

The ELKE shall not cooperate with suppliers who are involved in bribery and corruption practices and shall immediately cease any whatsoever commercial relations, where it becomes aware of such cases, by also taking the requirements of the legislation into account.

Warning Signs - Red Flags

The employees of the ELKE must be aware of the following warning signs in order that they may report cases that may highlight ELKE Policy issues.

These warning signs of their own accord do not prove that suspicious or illegal activity is taking place, but may highlight the need for additional investigation or even the implementation of appropriate actions. The following warning signs are indicative and employees should not restrict themselves to these signs in order to proceed with a complaint.

Suppliers and associates

- Requests the completion of its remittance is made to third parties that are not related to the commercial transaction;
- The supplier's fee is unusually high in relation to the market prices;
- The supplier's invoice does not describe in detail the item being offered;
- It is requesting to be paid in a country that is a centre for offshore companies;
- It is seeking payment being made into two or more accounts;
- It has been subjected to criminal or civil proceedings for acts that testify illegal, unfair or immoral behaviour;
- It does not agree to comply with the Anti-Bribery Policy of the ELKE;
- It refuses to respond to due diligence questions in relation to bribery; and
- It has a reputation for overlooking normal business channels or being associated with cases of bribery and corruption.

Other cases

- Notifications from competent auditing authorities regarding the non-submission or submission of an inaccurate Statement of Assets and/or Financial Interests;
- Submission of forged supporting documents (physical or financial objective);
- An employee or associate of the ELKE seeks to undertake the processing of a specific project; and
- Unreasonable delay in handling the submitted requests.

Complaints

The employees of the ELKE are encouraged and have an obligation to immediately report and without delay any phenomena or suspected bribery to the Anti-Corruption Commission and/or to appropriate public bodies such as the National Transparency Authority.

Where an employee is uncertain about how to handle a situation that is contrary or potentially contrary to this Policy, it should always request guidance from the Anti-Bribery Committee.

No employees shall suffer damages or sanctions because they have expressed concerns about bribery and corruption phenomena, refusal to bribe or been bribed. They nevertheless have the right and the capacity to submit their complaint anonymously.

The ELKE Anti-Corruption Committee has the authority and responsibility to investigate all the complaints about bribery phenomena that are submitted, regardless of their origin (employee, public bodies, suppliers and other third parties). It shall in every case inform the ELKE Administration and all the subsequent actions are subsequently implemented in accordance with the requirements of the legislation.

Compliance with Laws

The key principle of the ELKE is to comply with and respect the applicable laws, provisions and regulations of Greece and the European Union. It is the individual responsibility of the members of the Investigation Committee, the participants on the ELKE Committees and Bodies and the employees to avoid any activity that may involve the ELKE in an illegal act or defamation.

The ELKE shall systematically monitor the legislation and modify its relevant procedures and practices when required, by ensuring to inform those involved.

Maintaining Records

The ELKE maintains financial records and implements the appropriate internal and external audits, which demonstrate the reason for making each payment.

All of the accounts, invoices and other documents and records that are related to financial transactions must be completed and maintained with strict accuracy and completeness. No account shall be kept off the books in order to facilitate or conceal improper payments.

Monitoring and review

The effectiveness of this Policy's implementation shall be regularly monitored and evaluated, with respect to its appropriateness and adequacy. Improvements that are deemed necessary shall be implemented as soon as possible.

Periodical audits shall be carried out in relation to compliance with this Policy and the relevant legislation. Audits may be carried out internally or assigned to external auditors.

Summary

The ELKE does not tolerate any form of bribery or corruption and shall not under any circumstances provide, offer, or offer to provide, approve or request someone to directly or indirectly provide benefits of any whatsoever kind to persons, in order that these persons may proceed to an act or omission, in violation of their duties. The ELKE shall never directly or indirectly request or accept benefits of any whatsoever kind or the promise thereof, in order to cause or reward inappropriate behaviour in the form of acts or omissions that arise from or conflict with someone's duties.

This Policy shall apply and remains unchanged, irrespective of the form of associations that the ELKE has developed with third parties.

The Policy designates the framework that must be complied with by all the parties involved irrespective of customs or practices that dictate otherwise. All the parties involved are responsible for comprehending and complying with the requirements of the Policy, as these are applicable on each occasion.

Intentional or unintentional deviations from the Policy may lead to disciplinary action, which may result in dismissal for serious misconduct, as well as criminal prosecution of the person involved, on the basis of the applicable legislation.

The monitoring of compliance with the requirements of the Policy and the Anti-Bribery System of the ELKE is continuous and carried out by either appropriate ELKE personnel or by external audit bodies.

The ELKE Anti-Corruption Committee is available to every interested person in relation to submitting a complaint or providing clarifications and advice on issues that relate to this Policy.

Where behaviour is observed that may violate this Policy, we encourage every whatsoever person to immediately contact the Anti-Bribery Committee. A complaint may be submitted:

a. by filling out a form at the following link <https://research.upatras.gr/iso-37001/> or b. by post to the following details:

To MODY ELKE,
University Campus – Building A, Rio Patras Post Code 26504,
Attention: ELKE Anti-Corruption Committee.

The Anti-Bribery Committee shall treat the report confidentially, to the extent that this is permitted by the legislation. It shall be permitted to lodge an anonymous complaint.

The members of the ELKE Anti-Corruption Committee on the basis of the EU meeting bearing number 863/16.05.2023 are:

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