



POLICY REGARDING ORGANIZED CRIME, CORRUPTION, AND BRIBERY

Effective Date: July 1, 2022

Issuing Authority: President

Responsible Department: Human Resources

Policy Number: HR 10.07

Review Period: 5 years

Last Review: July 1, 2022

I. Introduction

This policy establishes the official policy at the University of Tulsa regarding organized crime, corruption, and bribery.

II. Applicability

This policy applies to Faculty Members and Professional Staff Members of the University of Tulsa.

III. Definitions

Payment: Paying, offering, promising to pay, or authorizing to pay or offer money or anything of value with the intent to induce improper behavior. "Anything of value" can include services, gifts, lavish meals, entertainment, travel expenses, favors for family or acquaintances, or the uncompensated use of University facilities or property.

Corruption: Activities taken to induce an official or private person to misuse his or her authority, such as inducing the person to take any improper action or to refrain from taking appropriate actions.

Related entity: Entities based either inside or outside the United States that are directly or indirectly controlled by the University of Tulsa. The term "controlled" means the possession, directly or indirectly, of the power to direct or cause the direction of the management policies of an entity, whether through the ownership of voting securities or by contract or otherwise.

IV. Policy

All employees of the University of Tulsa are strictly prohibited from engaging in any type of corrupt activity, including unlawful bribery of a government or private person in connection

with University activities. This prohibition extends to persons and organizations acting on the University's behalf, including contractors, consultants, attorneys, and agents.

As explained more fully below, compliance with this policy has three major components:

- Refusing to engage in any actual or attempted corrupt activity; and promptly reporting the circumstances to the person's direct supervisor or other University official with management responsibility for the subject activity;
- Recognizing and appropriately addressing situations that may involve corruption; and
- Ensuring that transactions, activities, and payments are approved, documented, and processed through routine University channels.

Each member of the University community must refuse to participate in any attempt to bribe or make any other improper Payment (as defined below) to a public or private person in connection with a University activity. This includes, as examples only: (i) offering or providing a Payment to a government official to rule favorably on an application for tax exemption or a permit, registration, or license; (ii) making a Payment to a private person or official who has responsibility for awarding or influencing the award of a grant, contract, or gift; (iii) reimbursing an official for personal expenses other than as part of bona fide, documented University activity or project in accordance with University of Tulsa expense policies; and (iv) providing any Payment to a consultant, agent, or other person to enable any of the foregoing or other corrupt activities.

In addition, faculty, staff, and other representatives of the University of Tulsa are expected to recognize and appropriately address situations that raise corruption concerns, or so-called "red flags." Red flags include, but are not limited to:

- A history of corruption in the country;
- An unusual payment pattern or financial arrangement;
- A party's refusal to agree in writing not to violate applicable anti-corruption laws;
- Lack of transparency in expenses and accounting records;
- Apparent lack of qualifications to perform the services offered; and
- Proposed selection of a vendor or service provider based on the recommendation of a governmental official or other person with responsibility for or influence over the award of a grant, contract, or gift.

These circumstances require closer scrutiny into the planned activities, but do not necessarily prohibit going forward after the University department, working with appropriate University resources (as referenced below), confirms that the planned activities will be lawful and in keeping with the University's requirements of ethical conduct.

All proposed contracts and transactions for grants, contracts, and gifts should go through routine appropriate channels within the University and have a documented legitimate purpose. Proposals and agreements for sponsored projects, for example, are reviewed and approved by the University’s Office of Research and Sponsored Projects. Legitimate purposes may include, as examples only, making fair payment for services actually provided or for hosting research conferences in accordance with University practices.

Each department should maintain accurate and current financial records of its transactions and projects. Expenses and payments must never be hidden or purposefully misclassified. In addition, each department should have sufficient knowledge of its vendors, agents, consultants, and collaborators in any transaction or activity to reasonably assure that there is a common commitment to principles of lawful and ethical conduct, including compliance with anti-corruption laws. For new relationships, this often involves due diligence on service providers, agents, and other participants, particularly in countries with a history of corruption or where a provider, agent, or participant has been recommended by government officials.

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

Compliance with anti-corruption laws and policies can be complex, and the University has a variety of resources to help. The Vice President for Research and Economic Development, with guidance from the General Counsel, has overall responsibility for oversight and implementation of the University of Tulsa’s anti-corruption compliance programs with respect to research activities. The Provost, with guidance from the General Counsel, has overall responsibility for oversight and implementation of the University of Tulsa’s anti-corruption compliance programs with respect to academic, service, and other activities, except for research. Any instances where a corrupt Payment has been requested by a private or public official should be reported to a person’s direct supervisor or other University official with management responsibility for the subject activity. In addition, all such instances should be reported to the University of Tulsa’s General Counsel. Individuals with questions or issues about anti-corruption may reach out directly to the Vice President for Research and Economic Development or the General Counsel.

Revision Record

| Revision Effective Date | Version | Notes |
|--------------------------------|----------------|----------------|
| July 1, 2022 | 1 | Policy enacted |

This policy is not a contract. The University of Tulsa reserves the right to modify, revise, rescind or grant exceptions to this policy.