



Anti-Corruption Policy

Purpose

Tufts University and their controlled corporations, affiliates, vendors and agents engage in activities around the world. As part of its commitment to ethical conduct, those whom the University has employed or engaged to speak or act on its behalf must comply with the Foreign Corrupt Practices Act (“FCPA”) and other applicable anti-bribery and anti-corruption laws and regulations. This obligation extends to the international laws of other countries in which Tufts operates or otherwise conducts business, including, without limitation, the United Kingdom’s Bribery Act (each an “Anti-Corruption Law” and collectively, “Anti-Corruption Laws”). This policy describes the University’s commitment to this effort, and describes the obligations of all Tufts faculty, students and staff to conform their business activities to all applicable anti-bribery and anti-corruption laws and regulations.

Scope

This Policy applies to all officers, directors, students, employees and faculty (both full and part time) of all schools and divisions at Tufts University, Tufts University community members and Tufts University’s direct and indirect majority-owned or controlled affiliates and subsidiaries (collectively, the “University”), anywhere in the world.

Definitions

Bribe: Bribe means any advantage or anything of value (including any item, service, payment or anything else, whether in a form of a personal benefit/favor or otherwise) offered or provided to any person, directly or indirectly, to:

- improperly influence or reward a desired action;
- improperly influence or reward an act in violation of a lawful duty;
- cause someone to refrain from acting in violation of a lawful duty;
- secure any improper advantage; or
- improperly influence the decision of a government or government official.

Bribery: Bribery means an offer or receipt of any Bribe.

Corruption: Corruption means the misuse of entrusted power for private gain.

Government Official: Government Official includes any individual acting on behalf of any local, regional, state or national government (such as elected officials, customs officials, tax officials, etc.), as well as any (i) individual acting on behalf of a government-owned enterprises (such as



professors, doctors and staff of public universities or employees at state owned companies, etc.), (ii) political party or candidate for public office, and (iii) individual acting on behalf of public international organizations (such as the United Nations, World Bank and Organization of Economic Co-Operation and Development (“OECD”), *etc.*).

Potential Referral Source: A Potential Referral Source is a person or entity who is in a position to refer business to the University, including, without limitation, those who make employee, student, donor, research, patient, product or service referrals to the University.

Policy Statement

The University requires that all faculty, staff, students and agents comply with all applicable Anti-Corruption Laws. The University does not tolerate any form of Bribery or Corruption, whether involving a Government Official, Potential Referral Source, or any other party, or whether the transaction involves the University purchasing or selling items or services, conducting research or engaging in educational, patient care or other activities. The University makes research, educational, patient care and business decisions and conducts its work based on price, quality, and service. Thus, Bribery of any kind, within or outside of the United States, notwithstanding any local practice, custom or convention, is strictly prohibited.

The University prohibits its personnel and any third party individual or entity acting on its behalf or for its benefit to promise, make or accept a Bribe either directly or indirectly (e.g. through third parties or intermediaries) in connection with University business. This Policy applies to informal interactions as well as formal Agreements.

Neither University personnel, nor any third party individual or entity acting on behalf or for the benefit of the University, may request, agree to receive, or accept any advantage or anything of value, either personally or for any other person or entity, if such advantage or thing of value is given with the intent to improperly influence a business decision.

Bribery and Corruption can take many forms, including, for example, gifts to Government Officials, Potential Referral Sources, or their family members; sham consulting or partnership agreements; excessive compensation; and sponsorship of non-business or non-academic travel. Even some common business practices, such as lavish entertainment, paying for spouses to participate in business travel, and making political or charitable donations, can be construed as corruption if abused.

University personnel are expected to be familiar and comply with the University’s policies regarding acceptable business and ethical practices, including, for example, the University’s policies on Donations, Sponsorships, Research Studies, Conflict of Interest and Professional Code of Conduct.

Individuals who act on behalf of the University are subject to the following guidance:

- Tufts University’s record keeping requirements and financial controls for cash and non-cash transactions.



- Appropriate level of due diligence before entering into an agreement or providing any type of payment to the agent.
- Appropriate level of approval before providing high-value hospitality (e.g., gifts above a nominal value such as small University-branded items; meals costing over usual and customary amounts based on the location; travel; and entertainment) to a foreign official, or the family members or friends of a foreign official.
- Limited travel or entertainment for a foreign official, or the family members or friends of a foreign official without an independent, legitimate business purpose.
- Reporting requirements of any suspected or potential violations of any Anti-Corruption Law or this Policy.
- Non-retaliation requirements against anyone who makes a good faith report of a suspected violation of an Anti-Corruption Law or this Policy.

Facilitating Payments

Facilitating Payments are any gifts or payments to any person, including a Government Official, made to expedite or facilitate performance of a routine action, such as processing paperwork.

Books and Records; Financial and Accounting Controls

All University business records must accurately reflect the true nature and extent of the transactions or expenditures at issue. The purpose of all University transactions must be accurately and promptly recorded. The reporting of the University's assets, liabilities, revenues and expenses must also be prompt and accurate. The University maintains internal accounting controls designed to prevent inaccurate financial records and accounts.

Compliance

A violation of Anti-Corruption Laws can result in civil and criminal prosecution of both the University and the individuals involved, resulting in fines, imprisonment, and other adverse consequences.. Failure to comply with this Policy, or falsification of documents, may result in disciplinary or corrective action by the University, up to and including termination of employment, expulsion or termination of a contract for services.

Any contracts with or involving foreign officials should be in writing and reviewed by the Office of University Counsel prior to execution of any such contract.

If you have any question about whether a person, agency or other entity with whom you are dealing is a foreign official, consult the Office of University Counsel.



Approval Entity(ies)

Office of University Counsel
Finance Division

Approval Date

April 22, 2021

Effective Date

April 22, 2021

Last Updated

March 15, 2024

Executive Sponsor(s)

Michael Howard, Executive Vice President
James Hurley, Treasurer
Mary R. Jeka, Senior Vice President and General Counsel

Responsible Office(s)

Finance Division Office
Office of University Counsel

Revision

The University reserves the right to change this policy from time to time. Proposed changes will normally be developed by those responsible for the policy with appropriate stakeholders. The approval entities have sole authority to approve changes to this policy.

Review Cycle

This Policy shall be reviewed periodically and updated as needed.