



ANTI-BRIBERY AND CORRUPTION POLICY

Issued in accordance with the laws of Malta and applicable European Union instruments.

Document Owner	EAI Senate
Policy Sponsor	Rector and Head of Institution
Policy Number	EAI/2024/150901
Version	1.0
Custodian	Dean – Quality Assurance Cell (policy administration, registers and training) and the Whistleblowing Reporting Officer (designated internal reporting channel under the Protection of the Whistleblower Act, where applicable), in coordination with the Malta legal representative.
Applies to	Members of the Senate, Board of Advisors and other relevant governance bodies; the Rector, Vice-Rector, Deans, institutional council and committee members; all academic, administrative and support staff; volunteers; agents, consultants and other third parties acting for or on behalf of the Institute.
Jurisdiction	Malta, with application, where relevant, to activities undertaken outside Malta by persons acting for or on behalf of Euro American Institute Malta.
Related Policy #	Companion policy to the Internal Quality Assurance Manual (EAI/2023/231212) and the Institute's Ethics Policy (EAI/2023/231209).
Approved By	The Senate
Effective Date	12/09/2024
Review Date	12/09/2027
Classification	Institutional Policy - Mandatory



EURO AMERICAN INSTITUTE
AGORA BUSINESS CENTRE LEVEL 2
TRIQ IL WIED TA' L IMSIDA
MSIDA, MSD 9020, MALTA
ga@euroamerican.edu.mt



Table of Contents

1. Introduction and Purpose
2. Scope and Application
3. Legal and Regulatory Framework
4. Zero Tolerance for Bribery and Corruption
5. Key Definitions
6. Gifts, Hospitality and Entertainment
7. Facilitation Payments and Extortion
8. Political and Charitable Contributions and Sponsorships
9. Third Parties, Agents and Due Diligence
 - 9A. Areas of Particular Risk for the Institute
10. Conflicts of Interest
11. Financial Controls and Accurate Records
12. Raising Concerns and Reporting
13. Roles and Responsibilities
14. Training and Communication
15. Breach of this Policy and Disciplinary Action
16. Risk Assessment and Due Diligence
17. Monitoring, Audit and Review
18. Related Policies and Documents
19. Acknowledgement



1. Introduction and Purpose

Euro American Institute Malta (EAI) is committed to conducting its work honestly, fairly and professionally.

The Institute does not tolerate bribery or corruption in any form. We expect everyone who works for or represents EAI to follow the same standards.

This policy explains:

- What bribery and corruption mean.
- What behaviour is acceptable and what is not.
- How gifts, hospitality and payments should be handled.
- How concerns can be reported.
- What happens if this policy is not followed.

The purpose of this policy is to protect the Institute, its students, employees, partners and reputation and to ensure that our activities are carried out responsibly and in accordance with applicable laws.

2. Scope and Application

This policy applies to everyone working with or representing EAI, including:

- Members of the Senate, Board of Advisors and other relevant governance bodies.
- The Rector, Vice-Rector, Deans and academic leadership.
- Members of institutional councils and committees, and other members of management.
- Academic staff, visiting faculty, tutors, examiners and researchers.
- Administrative and support staff.
- Admissions, Finance, Student Support and IT teams.
- Volunteers, interns and work-placement participants.
- Consultants and education or recruitment agents.
- Representatives and intermediaries acting for EAI.
- Contractors, suppliers and other third parties acting for or on behalf of EAI, where applicable.

This policy applies to EAI activities in Malta and, where relevant, to activities carried out outside Malta by persons acting for or on behalf of the Institute.

Independent partner institutions and third-party organisations are responsible for compliance with the laws and regulatory requirements applicable to them. Where appropriate, EAI may require compliance with relevant anti-bribery and anti-corruption standards through contractual arrangements. These arrangements do not limit EAI's obligations under applicable law.

3. Legal and Regulatory Framework

EAI will comply with the applicable anti-bribery and anti-corruption laws and regulations of Malta.



The Institute also takes into account relevant European and international standards relating to preventing bribery, corruption and the protection of people who report wrongdoing.

Where EAI operates or works with organisations in other countries, other applicable laws may also need to be considered.

The principal legal and regulatory framework relevant to this policy includes the Criminal Code (Chapter 9 of the Laws of Malta), the Permanent Commission Against Corruption Act (Chapter 326), the Protection of the Whistleblower Act (Chapter 527), and, where applicable, Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law. EAI will also comply with any other applicable Maltese or European Union legislation.

4. Zero Tolerance for Bribery and Corruption

EAI has a **zero-tolerance approach to bribery and corruption**.

No one working for or representing the Institute may:

- Offer a bribe.
- Give a bribe.
- Ask for a bribe.
- Accept a bribe.
- Offer or accept a secret commission.
- Make an improper payment.
- Give money or another benefit to obtain an unfair advantage.
- Use another person or organisation to do any of the above.

This rule applies whether the other person is:

- A government official.
- A student or prospective student.
- A business partner.
- An agent.
- A supplier.
- An employee.
- A private individual or organisation.

Bribery is not acceptable even when someone says that it is necessary to get business, admissions, accreditation, funding, licences or other opportunities.

EAI will not subject any person to retaliation or disadvantage for refusing to pay or accept a bribe in connection with EAI activities, even where such refusal results in the loss of business, an admission, a contract, an approval or another opportunity.



5. Key Definitions

Bribery

Bribery means offering, giving, asking for or receiving something of value to improperly influence a decision or obtain an unfair advantage.

It can involve money, gifts, services, favours, employment opportunities or other benefits.

Corruption

Corruption means using a position or responsibility improperly for personal or organisational benefit.

Kickback

A kickback is an undisclosed payment or benefit given in return for favourable treatment or business.

Improper Advantage

An improper advantage is a benefit obtained through unfair, dishonest or inappropriate means.

Facilitation Payment

A facilitation payment is a small unofficial payment made to speed up or secure a routine service that someone is already entitled to receive.

EAI does not allow such payments.

6. Gifts, Hospitality and Entertainment

Gifts and hospitality can sometimes be part of normal professional relationships. However, they must never be used to influence a decision or create an obligation.

Employees and representatives should not offer or accept gifts or hospitality when they could appear to influence a business, academic, admissions, procurement or regulatory decision.

Examples include:

- Cash or cash equivalents.
- Expensive gifts.
- Personal benefits.
- Unreasonable entertainment.
- Free travel or accommodation.
- Gifts given during an important decision or approval process.

Small and reasonable professional gifts may be acceptable where they are lawful, transparent and appropriate.



The following rules apply:

- Any gift or hospitality worth more than €50, offered or received, must be declared in writing to the Dean – Quality Assurance Cell and recorded in the Gifts and Hospitality Register.
- Any gift or hospitality of any value involving a public official, a regulator, an accreditation or professional body, or a current or prospective student or their family, must be declared and recorded in the same way.
- Cash, vouchers and cash equivalents must never be offered or accepted as gifts.
- Gifts or hospitality from applicants, students or their families in connection with admission, assessment, marks, exemptions or awards must always be refused.
- Gifts or hospitality that have been refused should also be noted in the Register.

If you are unsure whether a gift or invitation is appropriate, discuss it with your reporting manager or designated authority before accepting or offering it.

7. Facilitation Payments and Extortion

EAI does not permit facilitation payments. Employees should not make unofficial payments to speed up routine services or obtain something to which the Institute is already entitled.

If someone demands money or another benefit and there is a genuine threat to a person's safety, the situation should be reported to the Dean – Quality Assurance Cell as soon as reasonably practicable and, where possible, within 48 hours.

Personal safety always comes first. Any payment made because of a genuine threat should be properly recorded and reported.

8. Political and Charitable Contributions and Sponsorships

EAI may support legitimate charitable, educational or community activities where such support is appropriate and properly approved.

All such contributions and sponsorships must:

- Have a genuine purpose.
- Be properly approved.
- Be properly documented.
- Be made to a legitimate organisation or activity.
- Not be used to obtain an unfair business or regulatory advantage.

EAI does not make donations or payments to political parties, candidates or campaigns, in Malta or elsewhere.

9. Third Parties, Agents and Due Diligence

EAI may engage agents, consultants, recruitment partners, education partners, suppliers and other independent third parties.



EAI expects third parties acting for or on behalf of the Institute to conduct themselves honestly and lawfully and, where appropriate, requires relevant anti-bribery and anti-corruption obligations to be included in written agreements.

Before appointing a third party to act for or on behalf of EAI, the Institute should consider:

- Who the person or organisation is.
- Their experience and reputation.
- The services they will provide.
- The reason for their appointment.
- The payment or commission being proposed.
- Any possible conflict of interest.
- Whether there are any warning signs of improper activity.

Payments to third parties must be reasonable, properly approved and supported by appropriate documentation.

No person acting for or on behalf of EAI may be used to make a payment or provide a benefit that EAI could not properly make or provide directly.

All agents, recruitment partners and consultants acting for or on behalf of EAI must be engaged under a written agreement. Such agreements must contain appropriate anti-bribery and anti-corruption obligations, clear remuneration terms and a right for EAI to terminate the arrangement for material breach of those obligations. Audit or verification rights may be included where appropriate and proportionate to the nature and risk of the relationship. Where commission-based remuneration applies, commissions must be paid in accordance with the written agreement, supported by appropriate documentation and never paid in cash. The checks carried out before appointment, and the reasons for the appointment, must be documented and kept by the Dean – Quality Assurance Cell.

9A. Areas of Particular Risk for the Institute

Because EAI is a higher education institution, some situations carry a higher risk of bribery or improper influence. Everyone should be especially careful in the following areas:

- Admissions: no offer of a place, scholarship, fee reduction or entry-requirement waiver may be made in return for an improper payment, gift or favour. Admissions decisions are taken only on the published criteria.
- Examinations, assessment and awards: no marks, grades, exemptions, recognition of prior learning, progression decisions or qualifications may be influenced by an improper payment, gift, favour or personal relationship. Examiners and assessors declare any conflict of interest before marking.
- Recruitment agents: agents may not promise admission, academic results or visas and may not offer anything of value to the Institute's staff. An agent may collect EAI programme fees only where expressly authorised in writing by EAI, and any authorised collection must follow the Institute's published fees and approved payment arrangements.



- Accreditation, recognition and regulatory dealings: all contact with the MFHEA, MQRIC, professional bodies and partner institutions is conducted transparently. No gift, hospitality, commission, sponsorship or favour may be offered to influence, or appear to influence, an accreditation, recognition, exemption, partnership or inspection decision.
- Partnerships and third-party arrangements: payments to or from partner institutions or authorised third parties are made under written agreements, for genuine services and at documented rates.
- Procurement: contracts are awarded on merit under the Procurement Procedures; staff involved declare any interest in a bidder.
- Staff appointments and promotions: decisions are taken on merit; no payment or favour may be offered or accepted in connection with an appointment.

10. Conflicts of Interest

A conflict of interest can occur when a person's personal, family, financial or business interests could affect—or appear to affect—their work for EAI.

Examples include:

- Selecting a supplier owned by a family member.
- Making a recruitment decision involving a close friend.
- Receiving a personal benefit from a business partner.
- Having an undisclosed financial interest in a company working with EAI.

Employees should disclose any actual or potential conflict to their manager or the appropriate authority.

Conflicts must be declared in writing to the Dean – Quality Assurance Cell and recorded in the Conflicts of Interest Register. Members of the Senate, Board of Advisors and other relevant governance bodies declare their interests annually and at the start of any meeting where a conflict arises.

Having a conflict does not automatically mean that someone has done something wrong. The important point is that the conflict is disclosed and managed openly.

11. Financial Controls and Accurate Records

EAI must maintain accurate and complete financial records.

All payments and expenses should:

- Have a genuine business or institutional purpose.
- Be properly approved.
- Be supported by appropriate documents.
- Be recorded accurately.
- Be made through approved payment processes.

No one should create false records, hide payments or use unofficial accounts to make or receive payments.

Expenses must not be submitted for personal benefits or activities that were not authorised.



12. Raising Concerns and Reporting

Everyone working with EAI has a responsibility to report suspected bribery, corruption or other serious wrongdoing connected with EAI activities. Concerns may include improper payments, suspicious commissions, misuse of funds, undisclosed conflicts of interest, improper gifts, pressure to breach this policy, or misconduct by an employee, agent, partner or supplier.

Reporting a concern

Whistleblowing Reporting Officer: Ms. Ekta Sharma, Deputy Registrar (Academics)

Dedicated reporting email: confidential@euroamerican.edu.mt

Reports may be emailed directly to the Whistleblowing Reporting Officer. No prescribed form is required. Describe the concern, relevant dates and people, and any supporting information lawfully available to you.

A written report may also be sent to EAI's Malta address on the cover, in a sealed envelope marked "Private and confidential – Whistleblowing Reporting Officer only". Such correspondence must be passed unopened to the officer. An oral report, including a confidential physical meeting within a reasonable time, may be requested through the same email or by contacting the officer directly. Any minutes will be offered to the reporting person to check, correct and sign; audio recording requires consent.

A Department / School Head or Dean approached about a concern must preserve confidentiality and help the person report directly to the officer. If the officer is unavailable, implicated or otherwise conflicted, the report may be made directly and confidentially to the Rector, or to the Vice-Rector if the Rector is implicated or conflicted. Sealed correspondence may be addressed to the relevant office at EAI's Malta address. No person implicated in a concern may be responsible for handling or deciding it.

Handling reports and providing feedback

The reporting mailbox must be used solely for confidential reports, monitored regularly and accessible only to the designated Whistleblowing Reporting Officer, including a formally appointed replacement while acting in that role. EAI must ensure secure absence cover. General institutional inboxes must not be used for confidential disclosures.

The officer reviews the information, seeks clarification where needed, records the follow-up and arranges referral for an impartial investigation where appropriate, without disclosing the reporting person's identity contrary to law. The reporting officer does not act as the investigator and remains responsible for communication with the reporting person.

Where the reporting person can be contacted, receipt will be acknowledged within seven days. Feedback on the follow-up envisaged or undertaken will be provided within three months of acknowledgement or, if no acknowledgement was sent, within three months of the expiry of the seven-day period after the report was made. Feedback does not necessarily mean that an investigation has been completed.



Confidentiality and protection

Reports and related records must be kept securely, with access limited to authorised persons. Information identifying, or capable of identifying, the reporting person must not be disclosed without that person's express written consent, in accordance with the Protection of the Whistleblower Act. Information about other persons must also be protected. Records will be retained only for as long as necessary and proportionate under applicable law; unnecessary personal information must not be collected and must be deleted if received.

Anonymous information may be received and considered as far as the available information permits. Statutory protection depends on the requirements of the Protection of the Whistleblower Act, including applicable requirements concerning identification of the reporting person.

EAI will not tolerate retaliation or disadvantage against anyone who raises a genuine concern on reasonable grounds, or against persons who assist them or are otherwise protected by law. Statutory protection is determined by the Act, not by EAI's approval of a disclosure. A concern that proves unfounded is not, by itself, a breach of this policy; knowingly providing false information may result in appropriate action under applicable law.

External reporting

A concern may be reported to a competent external authority under the Protection of the Whistleblower Act where its requirements are met, including where an exception permits direct external reporting. For corrupt practices, the designated authority is the Permanent Commission Against Corruption. The [official Maltese whistleblowing portal](#) provides the authorities' respective remits and contact points. Nothing in this policy prevents reporting suspected criminal conduct to the Malta Police or an appropriate regulatory matter to the MFHEA or another competent regulator.

13. Roles and Responsibilities

Senate

The Senate approves this policy, receives an annual report on its operation and ensures that it is applied throughout the Institute.

Rector

The Rector is the policy sponsor and sets the expectation that bribery and corruption are never acceptable at EAI.

Dean – Quality Assurance Cell

The Dean – Quality Assurance Cell is the custodian of this policy: keeps the Gifts and Hospitality Register, the Conflicts of Interest Register and the record of third-party checks; organises training and keeps training records; reviews implementation annually; and reports to the Senate.

Whistleblowing Reporting Officer

The Whistleblowing Reporting Officer receives and follows up reports under Section 12, maintains confidentiality and communicates with the reporting person, independently of line management. The Rector must ensure that an impartial officer and secure cover



arrangements are designated, and that the reporting contact details in Section 12 are kept current.

Employees and Faculty

Everyone must:

- Follow this policy.
- Avoid bribery and improper conduct.
- Report concerns.
- Ask for guidance when unsure.
- Keep accurate records.

Finance Team

The Finance Team should ensure that payments and financial records are properly documented and approved.

Admissions and Recruitment Teams

Admissions and recruitment activities must be conducted fairly and transparently.

Agents and Partners

Agents and partners working on behalf of EAI are expected to follow this policy and any relevant contractual requirements.

14. Training and Communication

EAI will provide appropriate information or training to employees and relevant representatives so that they understand:

- What bribery and corruption mean.
- What is expected from them.
- How to handle gifts and hospitality.
- How to identify possible risks.
- How to report concerns.

New employees and relevant representatives should be made aware of this policy as part of their induction or onboarding.

15. Breach of this Policy and Disciplinary Action

Any breach of this policy may result in appropriate action.

Depending on the seriousness of the matter, this may include:

- Formal warning.
- Disciplinary action.
- Termination of employment or contract.
- Termination or suspension of a contractual relationship with an agent or business partner, where appropriate.
- Recovery of funds where appropriate.



- Reporting the matter to relevant authorities where required.

Serious cases of bribery or corruption may also result in legal action.

Any disciplinary or contractual action will follow applicable law and the relevant institutional procedures and contractual terms.

16. Risk Assessment and Due Diligence

EAI will take reasonable steps to identify areas where bribery or corruption risks may arise.

Particular attention should be given to:

- Agents and intermediaries.
- International partnerships.
- Government and regulatory dealings.
- Admissions and recruitment.
- Procurement.
- Large or unusual payments.
- High-value gifts or hospitality.
- Activities in higher-risk environments.

Where a significant risk is identified, EAI may carry out additional checks before entering into or continuing a relationship.

17. Monitoring, Audit and Review

EAI will periodically review how this policy is being implemented.

This may include reviewing:

- Payments and expenses.
- Agent and partner relationships.
- Gifts and hospitality.
- Conflicts of interest.
- Reported concerns.
- Relevant internal controls.

The policy may be updated when there are changes in law, regulations, institutional operations or identified risks. The Dean – Quality Assurance Cell reports to the Senate at least once a year on the operation of this policy, including the registers and an anonymised summary of concerns and follow-up, subject to the confidentiality requirements in Section 12. The policy is reviewed at least every three years, and earlier if the law, the Institute's operations or identified risks change.

18. Related Policies and Documents

This policy should be read together with other relevant EAI policies and procedures, including where applicable:

- Internal Quality Assurance Manual (EAI/2023/231212).



- Ethics Policy.
- Code of Conduct.
- Conflict of Interest Policy.
- Financial Policies and Procedures.
- Procurement Procedures.
- Admissions and Recruitment Policies.
- Staff Disciplinary Procedures.
- Data Protection and Privacy Policies.

Where there is a conflict between policies, the matter should be referred to the appropriate authority for clarification.

19. Acknowledgement

All employees, representatives and other individuals to whom this policy applies are expected to read and understand the policy.

By working with or representing EAI, individuals are expected to:

- Act honestly and professionally.
- Follow this policy.
- Say no to bribery and corruption.
- Declare conflicts of interest.
- Keep proper records.
- Report concerns when they arise.

Employee/Representative Acknowledgement

I confirm that I have read and understood the EAI Anti-Bribery and Corruption Policy and agree to follow its requirements.

Name: _____

Designation: _____

Department/ Organisation: _____

Signature: _____

Date: _____