



## ANTI-BRIBERY POLICY

### 1. Introduction

1.1 Hanoi School of Business and Management (hereafter HSB) requires all individuals acting on its behalf to conduct business honestly, fairly, and professionally. HSB is committed to the prevention of bribery and does not tolerate bribery, corruption, fraud, or dishonesty in any of its activities.

1.2 HSB is committed to abiding by all legislation relevant to the prevention of bribery and corruption in all nation-states in which it operates and is bound by the VN Anti Corruption Law 2025 in respect of its conduct both in the VN and overseas.

1.3 All members of HSB and third parties must abide by HSB's policies across the range of its activities and ensure transparency and openness in their dealings on its behalf.

1.4 Third parties will be bound by any contractual obligations relating to Anti-bribery, as set out in contracts and agreements.

1.5 Any allegation that a member of HSB has acted in a manner that is illegal or inconsistent with this Policy will be treated seriously and will be investigated. HSB reserves the right to terminate its contractual arrangements with any third party providing services for or on behalf of HSB where there is reasonable evidence that they/their staff have committed an act of bribery.

### 2. Scope of the Policy

2.1 The Policy applies to all individuals acting on behalf of HSB. It will therefore apply to all staff of HSB and all those third parties acting on its behalf, including (but not exclusively) agents, consultants, contractors, suppliers, subsidiaries, and joint venture



partners, wherever they may be located. The Policy will also apply to students when they are acting on behalf of HSB, either in a paid or voluntary role.

### **3. Definition**

3.1 Bribery, i.e. corruption is defined under the VN Anti Corruption Law 2025 as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so, in order to gain an advantage, whether personal or commercial.

3.2 Small payments to officials to facilitate routine Government business, known as facilitation payments or kickbacks, are also classified as bribery and are therefore illegal.

### **4. Responsibilities**

#### 4.1 Corporate and Personal Responsibilities

4.1.1 Responsibility for the implementation of this Policy lies with the Board of Rectors, acting on behalf of HSB.

4.1.2 All members of HSB and third parties acting on behalf of HSB are responsible for ensuring that their behavior at work is professional, honest, and fair. In their work for HSB they must comply with this Policy and in this respect are responsible for preventing, identifying, and reporting bribery wherever it may occur. This includes undertaking reasonable endeavors to ensure that their actions could not give rise to the perception or appearance that misconduct may have occurred, even if this is not actually the case.

#### 4.2 Record-Keeping

4.2.1 It is particularly important that accurate and transparent records are kept on purchasing, hospitality, expenses, gifts, etc.

#### 4.3 Due Diligence

4.3.1 In considering whether to recommend a particular supplier / collaborative partner to HSB, staff and individuals acting on behalf of HSB are reminded of the requirement to



evidence that they have undertaken a process of due diligence as set out in HSB's Financial Regulations and as also set out in the arrangements for the approval of Collaborative Courses.

#### 4.4 Reporting Concerns or Incidents

4.4.1 All members of HSB are encouraged to report concerns they may have of potential breach of the Anti-Bribery Policy whether on the part of other University/School members or third parties, as soon as possible. This includes any instances where they may be the victim of attempted bribery. In turn, HSB is committed to ensuring that its members have a safe and confidential way of reporting suspected wrongdoing. Concerns may therefore be raised directly with their Head of Department/Centre/Activity in the first instance or, where this is not felt to be appropriate, to the Group Finance Director or their nominee. HSB also permits staff and anyone contractually associated with HSB to raise concerns of serious malpractice in HSB. Heads of Department/Centre/Activity or their representative must report any suspected instances of fraud, including bribery, undertaken by members of HSB to the Board of Rectors.

4.4.2 Any allegations of misconduct under this Policy within the jurisdiction of HSB will be taken seriously. Should it be alleged that any member of HSB has acted in contravention of this Policy or the related VN legislation, action may be taken under HSB's Internal disciplinary actions as determined by the Head of Department or nominated representative. Attempted bribery or acceptance of a bribe may be considered an act of gross misconduct and, where it is considered that a criminal offence has occurred, the police may be informed.

### 5. Risk Assessment

5.1 It is important that an assessment is undertaken of the risks of bribery occurring, or of the perception arising that bribery may have occurred. This enables areas of specific



vulnerability to be identified and mitigating actions to be put in place that are proportionate and prioritized, recognizing that risks will vary from sector to sector, and depend on the location of the activity. The risk of bribery occurring is addressed through HSB's risk management processes. HSB's total risk portfolio is assessed through the anti-bribery risk register, which is maintained by the Finance Office and reviewed annually with risk owners. The register details specific known areas of risk and maps the policies, procedures, and processes in place to manage that risk. Departments are required as part of the Financial Procedures, to assess the risk of bribery occurring in relation to their activities and to assess specific business transactions where there may be particular risk. This includes for instance, where third parties are acting on behalf of HSB or where departments are dealing with individuals or organisations located in areas where corruption is relatively prevalent. Departmental assessment of the risk of bribery must also form an element of the due diligence undertaken when consideration is being given to entering into a business or academic partnership, acknowledging that such due diligence should be proportionate.

## **6. Gifts, Entertainment and Hospitality**

### **6.1 Acceptance of Gifts and Donations**

6.1.1. Gifts to members of staff should be dealt with in accordance with HSB's financial rules.

6.1.2 These policies state that HSB will not accept gifts that, in the opinion of the Fundraising Ethics Committee, are judged to be unethical or that put the reputation of HSB at unacceptable risk. This includes gifts that create an unacceptable conflict of interest or expose HSB to financial or legal liability. This will of course include bribery.

6.1.3 It is recognised that in the course of their work staff may be offered gifts from time to time, and this may be the norm in many parts of the world. However, Financial



Procedures clearly indicate that staff should not accept any gifts or rewards (or have them given to members of their family) from any organization or individual with whom they have contact in the course of their work that would cause them to reach a position whereby they might be, or might be deemed by others to have been, influenced in making a business decision as a consequence of accepting such a gift. If a member of staff receives a gift unexpectedly or is offered a gift and is unsure whether they should accept, given that refusal may cause offence, they should inform their Head of Department/Centre/Activity who may consult with the Registrar and/or the Group Finance Director. All departments must maintain a Gifts Register in which such gifts are recorded.

## 6.2 Acceptance of Hospitality

6.2.1 HSB policy and procedures on acceptance of hospitality are highlighted in our financial regulations which should be read in conjunction with this Policy.

6.2.2 In accordance with HSB's financial policies, staff may attend events organised by other bodies for promotional or business purposes but any hospitality which exceeds the norm or raises a potential conflict of interest should be avoided. HSB's financial policy sets out specific instances in which hospitality or entertainment should not be accepted, together with procedures for referring queries should staff be unsure as to whether they should accept an invitation.

## 6.3 Giving of Hospitality and Gifts

6.3.1 HSB's existing policies and procedures on business entertainment are set out in our internal finance policies.

6.3.2 In addition to the measures set out in the Financial Procedures, the following requirements must be met:



- a) Hospitality and gifts must not be given with the intention of influencing a third party to obtain or retain business or in order to gain a business advantage, rewarding a third party for any form of business advantage, or in exchange for benefits or favors, or to facilitate a routine business procedure. The objective in offering hospitality should be only the development of business relations.
- b) The hospitality or gifts provided should be proportionate to the circumstances and should never be excessively lavish.
- c) Hospitality and gifts must conform with local legislation as well as this Policy and the VN Anti Corruption Law 2025.
- d) Records of expenditure on hospitality and gifts must be kept in accordance with HSB's Financial Regulations and Procedures.

## 7. Facilitation Payments

7.1 As defined in Section 3.2, facilitation payments are payments (sometimes small) made to expedite or speed up routine government actions but which are not a legal requirement. It is common in many areas of the world to progress business in this way, but the 2018 Anti-corruption law is clear that this type of payment is illegal under VN legislation if it is made by a VN-based organization. HSB does not permit payments of this type to be made by members of HSB or third parties acting on its behalf.

7.2 If a member of HSB (or third party acting on its behalf) is required to make a legitimate payment to a public official on behalf of HSB, a cash payment should be avoided wherever possible and a receipt detailing the reason for the payment should be requested. Where suspicions or concerns are held regarding a request for a payment, advice should be sought from the Head of Department/Centre/Activity or the Finance Office.



7.3 If, however, a member of HSB (or a third party acting on its behalf) is forced under duress to make such a payment or their personal safety is threatened, the instance should be reported to the Head of Department/Centre/Activity as soon as possible after the event. The Head of Department/Centre/Activity should, in turn, contact the Finance & Planning Department via the anti-bribery resource account [antibribery@hsb.edu.vn](mailto:antibribery@hsb.edu.vn), and make a record of the payment in the departmental Register of Interests

## **8. Monitoring and Review**

8.1 HSB is committed to reviewing on an ongoing basis the effectiveness of its policies and procedures in relation to anti-bribery measures. The Policy will therefore be subject to regular review, as overseen by the Internal Inspector and informed by School risk management and audit process outcomes.

## **9. Equality, Diversity, and Inclusion**

An Equality Impact Assessment Screening has been carried out. As no equality and diversity issues were identified, a full Equality Impact Assessment is not required.

*Approved in December 2025*