

AREA OF RESPONSIBILITY: OFFICE OF BUSINESS AFFAIRS

RESPONSIBLE CONTACT: VICE PRESIDENT OF BUSINESS AFFAIRS

POLICY IDENTIFICATION: FOREIGN CORRUPT PRACTICES ACT POLICY

EFFECTIVE DATE: January 31, 2024

I. SCOPE

It is Virginia Union University's policy to comply with the anti-bribery provisions of the Foreign Corrupt Practices Act of 1977, as amended ("FCPA" or the Act"). Each employee of the University has the responsibility for compliance with the FCPA within his/her area of authority and for immediately reporting any violations to the Vice President of Business Affairs

II. POLICY STATEMENT

The provisions of the Act that make it a criminal offense for an officer, director, employee, or agent acting on VUU's behalf to make an offer, payment, or gift of money or other item of value, directly or indirectly, to (i) a foreign official, (ii) a foreign political party, (iii) a party official or (iv) a candidate for foreign political office for the corrupt purpose of obtaining or retaining business for the University or for the purpose of directing business to any other person. These are also prohibited outside the United States and such employees who violate will be held accountable as per federal law.

III. POLICY

The use of Virginia Union University funds or assets for any unlawful or improper purpose is strictly prohibited. No employee or agent of the University shall engage in any activity, including the provision of cash, gifts, entertainment expenses, travel, meals, lodging, shopping, living expenses, educational and medical expenses, or contracts or other business opportunities awarded to an organization in which a foreign officer holds a beneficial interest, investment opportunities other than an arm's length transactions for demonstrated fair market value for the stated illegal purposes.

No payment shall be made to, or for the benefit of, foreign official (any officer, employee or agent of a foreign government) for the purpose of, or otherwise in connection with, securing or obtaining favorable action by a government agency. Examples of favorable actions are as follows:

- influencing a foreign official in his official capacity to decide to act or fail to perform his official functions
- influencing foreign official's to grant a license or other authorization from such government
- influencing the foreign official to grant confidential information about business opportunities, bids, or the activities of competitors
- influencing foreign official's to grant relief from government controls
- influencing foreign official's to resolve governmental disputes

Reporting Potential Violations Suspected violations of the FCPA should be reported to the Vice President of Business Affairs.

