

Anti-corruption guidelines

The University of Copenhagen (UCPH) is dedicated to promoting academic excellence and is committed to upholding the highest standards of integrity and ethics in all its activities. As part of this commitment, the University condemns corruption in all its forms. These guidelines provides guidance on preventing and addressing corruption to maintain the University's reputation and trustworthiness.

These anti-corruption guidelines and the code of conduct applies to all members of the University, ensuring a transparent, honest, and accountable environment. This includes all staff, students, guest lecturers and affiliates of UCPH as well as members of the Board. Actions that violate these anti-corruption guidelines may result in employment-/enrolment-related and legal consequences.

What is corruption?

Corruption is defined as the abuse of entrusted power for personal gain. It includes, but is not limited to, bribery, fraud, embezzlement, extortion, and nepotism. It does not necessarily involve the exchange of money as it can also include services rendered for benefits such as preferential treatment, special protection, extra services, or shorter processing times. Corruption undermines the integrity of the University's operations and the trust placed in it by the public, students, and partners. Corruption threatens societal stability and security and undermines democratic institutions and values.

This definition aligns with the concept of corruption in Danish criminal law and international anti-corruption conventions, including

the UN Convention against Corruption, covering both the acceptance and offering of bribes and other forms of active or passive corrupt behaviour.

Principles

- **Any and all forms of corruption are unacceptable:** Actions deemed to be in violation of these anti-corruption guidelines may be subject to disciplinary action, including termination and legal proceedings if necessary.
- **Transparency and accountability:** All actions and decisions must be transparent and accountable, ensuring openness in all university dealings.
- **Fairness and impartiality:** Decisions must be made impartially and without favouritism, ensuring equality and fairness in all university activities.

Code of Conduct:

- **Conflict of interest:** Staff and students must avoid situations where private interests conflict or appear to conflict with their duties. Private interests cover personal gain as well as gains for family, relatives, friends, and persons/organisations to whom there is or has been a commercial or political affiliation. Any potential conflicts must be disclosed immediately to a superior or relevant authority.
- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence a decision is strictly prohibited. Bribery is a criminal offense in Denmark. This includes all direct and indirect forms of bribery.
 - **Facilitation payments** are small unofficial payments made to expedite or secure the performance of a routine or non-discretionary action by a

government official. Facilitation payments are considered a bribe and should not be made on behalf of UCPH, unless the person making the payment genuinely fears for their own or their companions' safety if the payment is not made.

- **Extortion and fraud:** Using threats, deception, or dishonesty to gain an advantage or cause harm is prohibited. This includes fraudulent activities, misleading information, and exploitation of university resources. Extortion and fraud are criminal offenses in Denmark.
- **Embezzlement:** The misuse or misappropriation of university funds or property for personal gain is forbidden. Embezzlement is a criminal offense in Denmark.
- **Gifts and hospitality:** Accepting or giving gifts, hospitality, or other benefits is generally not allowed. Small tokens of appreciation and hospitality in line with local customs are acceptable only if they do not affect impartiality or are given with the expectation of a favour in return. For further information and examples of gifts and other benefits that you can/cannot receive, please refer to the Danish Employee and Competence Agency's guide to ["Code of conduct in the public sector"](#).
- **Nepotism:** Favouritism based on personal relationships in employment, procurement, academic evaluations, or other university activities is prohibited.

Reporting

All employees, students, guest researchers and board members of UCPH are obligated to familiarise themselves with this code of conduct and adhere to its principles. Anyone with evidence or reasonable suspicion of violations of the rules must report this to their nearest supervisor or directly to University Controlling. Reporting can also be done via the [University's Whistleblower scheme](#).

Individuals reporting in good faith will be protected from retaliation. UCPH will ensure confidentiality and protection for those who come forward with information about corruption.

Sanctions

Depending on the concrete assessment, the following sanctions may be imposed if there is evidence or reasonable suspicion of corruption:

- Repayment of funds
- Disciplinary consequences, including dismissal or expulsion, for employees, students, visiting researchers and Board members.
- Contractual consequences for third parties, e.g. termination of contracts with UCPH
- The filing of police reports and initiation of civil legal proceedings.