

## DOANE UNIVERSITY ANTI-CORRUPTION POLICY

### 1. Introduction.

(a) **Combating Corruption.** Doane University ("**Doane**") has instituted this Anti-Corruption Policy ("**Policy**") to reiterate its commitment to integrity. This Policy explains the specific requirements and prohibitions applicable to Doane under anti-corruption laws, including, but not limited to, the US Foreign Corrupt Practices Act of 1977 ("**FCPA**"). This Policy contains information intended to reduce the risk of corruption and bribery arising from Doane's international activities. Doane strictly prohibits all forms of corruption and bribery.

Under the FCPA, it is illegal for US persons, including US colleges and universities, and their directors, employees, faculty, and agents, to bribe non-US government officials. The concept of prohibiting bribery is simple. However, understanding the full scope of the FCPA is essential, as this law directly affects Doane's international interactions.

Violations of the FCPA can also result in violations of other US laws, including anti-money laundering, mail and wire fraud and conspiracy laws. The penalties for violating the FCPA are severe. In addition to being subject to Doane's disciplinary policies, individuals who violate the FCPA may also be subject to imprisonment and fines.

(b) **Applicability.** This Policy is applicable to all of Doane's international operations. This Policy applies to all of Doane's directors, faculty, and employees (each of which is hereinafter referred to as an "**Affected Person**"). This Policy also applies to Doane's agents, consultants, and any other third-party representatives and their respective directors and employees (all of the foregoing are referred to as "**Associated Third Parties**"), that on behalf of Doane have conducted business outside of the US or interacted with non-US government officials or are likely to conduct business outside of the US or interact with non-US government officials.

### 2. Prohibited Payments.

Affected Persons and Associated Third Parties are prohibited from directly or indirectly making, promising, authorizing or offering anything of value to a non-US government official on behalf of Doane to secure an improper advantage, obtain or retain business, or direct business to any other person or entity. This prohibition includes payments to third parties where the Affected Person or the Associated Third Party knows, or has reason to know, that the third party will use any part of the payment for bribes.

(a) **Cash and Non-Cash Payments: "Anything of Value."** Payments that violate the FCPA may arise in a variety of settings and include a broad range of payments beyond the obvious cash bribe or kickback. The FCPA prohibits giving "anything of value" for an improper purpose. This term is very broad and can include, for example:

- (i) Gifts.
- (ii) Travel, meals, lodging, entertainment or gift cards.
- (iii) Loans or non-arm's length transactions.
- (iv) Charitable or political donations.
- (v) Business, employment or investment opportunities.
- (vi) Scholarships.

(vii) Internships or other employment.

(b) **Non-US Government Official.** The FCPA broadly defines the term non-US government official to include:

(i) Officers or employees of a non-US government or any department, agency or instrumentality thereof.

(ii) Officers or employees of a company or entity owned in whole or in part by a non-US government, including state-operated universities ("state-owned or -controlled enterprises").

(iii) Officers or employees of a public international organization (such as the United Nations, World Bank or the European Union).

(iv) Non-US political parties or officials thereof.

(v) Candidates for non-US political office.

This term also includes anyone acting on behalf of any of the above.

On occasion, a non-US government official may attempt to solicit or extort improper payments or anything of value from Doane employees or agents. Anyone who receives such a solicitation must inform the non-US government official that Doane does not engage in such conduct and immediately contact the Vice President of Finance.

(c) **Commercial Bribery.** Bribery involving commercial (non-governmental) parties is also prohibited under this Policy. To this end, Affected Persons and Associated Third Parties shall not offer, promise, authorize the payment of, pay, or provide anything of value to any employee, agent or representative of any institution to induce or reward the improper performance of any function or any business-related activity. Affected Persons and Associated Third Parties also shall not request, agree to receive, or accept anything of value from any employee, agent or representative of another institution or entity as an inducement or reward for the improper performance of any function or business-related activity.

### 3. **Permitted Payments.**

The FCPA does not prohibit all payments to non-US government officials. In general, the FCPA permits three categories of payments:

(a) **Facilitating Payments.** The FCPA includes an exception for nominal payments made to low-level government officials to ensure or speed the proper performance of a government official's routine, non-discretionary duties or actions, such as:

(i) Clearing customs.

(ii) Processing governmental papers, such as visas, permits or licenses.

(iii) Providing police protection.

(iv) Providing mail, telephone or utility services.

For purposes of clarity, it is Doane's policy that Affected Persons and Associated Third Parties shall not make any of the foregoing payments to non-US government officials unless local law permits such payments and official receipt will be provided. Moreover, any of the foregoing payments must also be pre-approved in writing by the Vice President of Finance.

(b) **Promotional Hospitality and Marketing Expenses or Pursuant to a Contract.** Affected Persons and Associated Third Parties may pay for the reasonable cost of a non-US government official's meals, lodging or travel if, and only if, the expenses are bona fide, reasonable, and directly related to the promotion, demonstration or explanation of a Doane education or of any other opportunity, benefit, products or services of Doane, or the execution of a contract with a non-US government or agency.

(c) **Promotional Gifts.** Promotional gifts of nominal value may be given to a non-US government official as a courtesy in recognition of services rendered or to promote goodwill. It is Doane's policy that Affected Persons and Associated Third Parties shall not make any promotional gift if its value is more than \$100. In no event shall any Affected Person or Associated Third Party offer or make any promotional gift to obtain any illegitimate benefit. If local law further restricts offering such gift, you shall comply with the more stringent restrictions of local law.

#### 4. **Political and Charitable Contributions.**

Contributions to candidates for non-US political office are prohibited unless the Vice President of Finance pre-approves them in writing. Charitable contributions to non-US charities must also be pre-approved in writing by the Vice President of Finance

#### 5. **Record Keeping.**

It is Doane's policy to implement and maintain internal accounting controls based upon sound accounting principles. All accounting entries in the respective books and records of Doane and Associated Third Parties must be timely and accurately recorded and include reasonable detail to fairly reflect its transactions. These accounting entries and the supporting documentation must be periodically reviewed to identify and correct discrepancies, errors and omissions.

(a) **Authorization for Transactions.** All transactions involving the provision of anything of value to a non-US government official must occur only with appropriate Doane authorization.

(b) **Recording Transactions.** All transactions involving the provision of anything of value to a non-US government official must be recorded in accordance with United States generally accepted accounting principles.

(c) **Tracking Transactions.** All transactions involving the provision of anything of value to a non-US government official must be tracked in a separate log or record, with supporting documentation identifying:

(i) The name and position of the employee requesting and authorizing the transaction.

(ii) The name and position of the non-US government official involved in the transaction.

(iii) A description, including the value of the payment or provision of anything of value, and, where applicable, a description of the Doane education or other opportunity, benefit, products or services of Doane being promoted or the relevant contractual provision if the payment was made pursuant to a contract.

#### 6. **Cash Payments.**

Cash payments of any kind to a third party, other than documented petty cash disbursements or other valid and approved payments, are prohibited. Checks shall not be written to "cash," "bearer" or anyone other than the party entitled to payment except to replenish properly used petty cash funds.

7. **Representatives.**

All Associated Third Parties must fully comply with the FCPA and all other applicable anti-corruption laws including the local law.

8. **Compliance.**

Affected Persons and Associated Third Parties must be familiar with and perform their duties according to the requirements set out in this Policy. Affected Persons and Associated Third Parties who violate this Policy are subject to disciplinary action, up to and including dismissal. Associated Third Parties who violate this Policy may be subject to termination of all relationships with Doane.

To ensure that all Affected Persons and Associated Third Parties are thoroughly familiar with the provisions of this Policy, the FCPA and any other applicable anti-corruption laws, Doane shall provide this Policy those Affected Persons and Associated Third Parties and provide further guidance as appropriate.

Any Affected Person or Associated Third Party who suspects that this Policy may have been violated must immediately notify Doane as specified in the section entitled "Reporting Policy Violations" below. Any Affected Person or Associated Third Party who, in good faith, reports suspected legal, ethical or Policy violations will not suffer any adverse consequence for doing so. When in doubt about the appropriateness of any conduct, Doane requires that you seek additional guidance before taking any action that may subject Doane to potential FCPA liability.

9. **Duty to Cooperate.**

Doane may at times undertake a more detailed review of certain transactions. As part of these reviews, Doane requires that each Affected Person or Associated Third Party cooperate with Doane, outside legal counsel, outside auditors or other similar parties. Doane views failure to cooperate in an internal review as a breach of your obligations to Doane, and will deal with this failure severely in accordance with any local laws or regulations.

10. **Questions About the Policy.**

If you have any questions relating to this Policy, please contact the Vice President of Finance.

11. **Reporting Policy Violations.**

To report potential violations of this Policy, immediately notify the Vice President of Finance.

Effective April 2015

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