



# **Anti-Corruption Directive (ACD)**

**Georg-August University of Göttingen**

**Georg-August University of Göttingen**

**Foundation under public law**

**including the University Medical Centre of Göttingen (UMG)**

**Medical Faculty and University Clinic**

**Status: 27.11.2020**

---

## Table of Contents

### Preamble

No.:	Description:	Page:
1.	Scope and application	5
2.	Definition of terms	5
3.	Consequences under criminal law and service or labour law	6
4.	Personal behavioural measures for all employees (Code of Conduct)	6
5.	Organizational measures by the Executive Board and executive personnel	6
6.	Anti-corruption officer	9
7.	Conduct in the event of suspected corruption	9
8.	Involvement of staff representatives	10
9.	Contributions from private third parties (sponsoring, donations, etc.)	10
10.	Acceptance of rewards, gifts and other benefits	11
11.	Representation tasks	11
12.	Public procurement	11
13.	Come into effect	12

### References to other applicable documents including references:

° Directive on the prevention and fight against corruption in the state administration

o (Anti-Corruption Directive) "of the state of Lower Saxony from April 1<sup>st</sup> 2014 (<http://www.nds-voris.de/jportal/?quelle=jlink&query=VVND-204800-LReg-20140401-SF&psml=bsvorisprod.psml&max=true>)

° Circular of the state on the "Prohibition of accepting rewards, gifts and other benefits" of 24<sup>th</sup> November 2016 (<http://www.nds-voris.de/jportal/?quelle=jlink&query=VVND-204110-MI-20161124-SF&psml=bsvorisprod.psml&max=true>)

° Acknowledgment by the UMG executive board regarding the applicability of the circular on the "Prohibition of accepting rewards, gifts and other benefits" of November 24, 2016

° Approval of the UNI Presidium on the applicability of the circular on the "Prohibition of Acceptance of rewards, gifts and other benefits" of 24<sup>th</sup> November 2016

° Procedural instruction of the UMG executive board on the reporting and investigating of rule and regulations violations that are anonymous or reported via the BKMS<sup>®</sup> system " of 24<sup>th</sup> September 2019

° Directive for dealing with donations from private third parties of the University Medical Centre Göttingen

---

°"Directives for University Funding" and "Directive for dealing with Donations from Private Third Parties" of the Georg-August University of Göttingen Foundation under public law ([https://intern.uni-goettingen.de/infocenter/ki/fundraising/fundraising\\_rules/Documents/Guidelines-Handling\\_Zuzue\\_priv\\_Dritter.pdf](https://intern.uni-goettingen.de/infocenter/ki/fundraising/fundraising_rules/Documents/Guidelines-Handling_Zuzue_priv_Dritter.pdf))

**Annex 1:** Code of conduct against corruption

**Appendix 2:** What is allowed and what is not?

---

### Preamble

The aim of this directive is to consistently follow up any corruption cases and to counter possible corruption in good time by taking preventive measures. This directive complements the requirements of the "Directive on the prevention and fight against corruption in the State Administration (anti-corruption directive)" of the State of Lower Saxony from April 1st, 2014 (decision of the LReg 20480, Nds. MBl. 2014, No. 16, p. 330) for the University of Göttingen foundation under public law.

At the same time, it takes into account that the University of Göttingen - University of Göttingen Foundation under public law and the University Medical Centre Göttingen (UMG), Medical Faculty and University Clinic, are entitled to attract funding (e.g. third-party funds, sponsorship money, donations, benefits in kind) for the purpose of the foundation (research, teaching and health care) from third parties.

The directive is intended to help prevent any suspicion of corrupt behaviour from arising in the first place and to protect employees from possible consequences under civil service, labour and / or criminal law. At the same time, the directive serves to protect the institution from breaches of faith vis-à-vis the public and documents its claim to the integrity and transparency in its actions, its altruism as well as its objectivity and neutrality.

---

### Notes:

° The Presidium of the University of Göttingen as a whole is referred to as the collegial body in the text for short as the "Presidium"; the board of the Göttingen University Medical Centre as a whole is referred to as a collegial body in the text for short as the "Executive Board".

° The dual responsibility for the revision & organization facility is expressed by naming the Presidium and/or Executive Board. The possible difference / duplication which exists is indicated by the formulation "respectively".

---

All employees, in particular executive personnel as well as the members of the Presidium or the Executive Board, are requested to consistently counter corruption or suspected corruption with the means at their disposal.

### 1. Scope and application

The ACD applies to all employees of the University of Göttingen Foundation under public law.

For own companies, spin-offs with a majority stake, associations and cooperations under the leadership of the respective part of the University of Göttingen Foundation under public law or similarly closely related units (keyword: university-related institutions), the goals of the ACD apply as an express recommendation and should be taken into account by those responsible. In addition, the managers of the holding companies are also requested to orient themselves to the rules and values of the shareholder.

The ACD is publicly announced institution-wide. The executive personnel shall ensure that the directive and its annexes are made known to all employees in their respective areas.

The topic of anti-corruption is the subject of the annual audit reports and is therefore perceptible to the Presidium, Executive Board and the respective foundation committees.

As soon as measures are (or must be) taken against corrupt employees in the event of justified suspicion or imminent danger, the employees concerned must be consistently protected against unjustified accusations and personal difficulties with the same consequence in the case of unfounded suspicion or if suspicion cannot be proven.

### 2. Definition of terms

The term "corruption" encompasses various acts, which are defined on the one hand by various criminal offenses<sup>1</sup> (e.g. "bribery" / "corruptibility", "accepting benefits" / "granting benefits"). On the other hand, there can also be culpable violations of service and labour law which serve to ensure a partisan, independent, altruistic and public welfare-oriented exercise of service<sup>2</sup>, justify allegations of corruption or corresponding breaches of duty.

---

<sup>1</sup> The following are considered to be classic corruption offenses: Acceptance of advantages (Section 331 StGB), taking bribes (Section 332 StGB), granting advantages (Section 333 StGB), bribery (Section 334 StGB), agreements restricting competition in tenders (Section 298 StGB), corruptibility and bribery in business dealings (§ 299 StGB), corruption and bribery in the health care system (§§ 299 a / 299 b StGB). Depending on the severity of the offense and the respective scope of punishment, a fine (in less serious cases) or imprisonment of 6 months to 5 years may be considered.

<sup>2</sup> Cf. the following regulations for civil servants, which, however, apply in the same way to the other employees: Orientation towards the common good / impartiality (§§ 33 ff BeamtStG), prohibition of accepting rewards, gifts and other benefits (§§ 42 BeamtStG, 49 NBG or "Prohibition of accepting rewards, gifts and other benefits" - According to RdErl. d. MI, d. StK and other min. from 24.11.2016- MI-Z 2.3-03102 / 2.4- VORIS 20411; Nds MBl. 2016, p. 1166 - declared by the board of directors as applicable to the UMG on September 12, 2017), see also: General working conditions for collective bargaining employees (Section 3 (3) TV-L) and special regulations for Doctors at university hospitals (§ 41 SR No. 2 to TV-L).

---

Applied to the University of Göttingen Foundation under public law, the term corruption includes, on the one hand, the abuse of a public office or a function for the benefit of another, committed on his or her initiative or on one's own initiative to obtain a material or immaterial advantage for oneself or a third party with admission or in expectation of a disadvantage for the general public or the institution. On the other hand, the term corruption includes acts that constitute breaches of service or labour law, such as the acceptance of rewards, gifts or other benefits to which there is no legal entitlement, which does not include the consent of the employer and the employees, but also so-called "third parties" (e.g. family, relatives, friends, your own department or the institution!) who become objectively better off materially or immaterially.

### 3. Consequences under criminal law and service or labour law

Violations of official duty in connection with corruption can have criminal consequences for the employees (fine or imprisonment) and / or consequences under service law or labour law (disciplinary measures / warnings up to and including removal from service / termination of employment). If the University of Göttingen Foundation under public law has suffered damage as a result of corruption, recourse proceedings shall be carried out.

### 4. Personal behavioural measures for all employees (Code of Conduct)

The Code of Conduct against corruption printed as Annex 1 is binding for all employees. It draws employees' attention to dangerous situations in which they could become entangled in corruption and is a guideline for all actions.

### 5. Organizational measures by leadership and executive personnel

The Presidium or the UMG executive board have the executives determine which jobs / work areas are at risk of corruption or are particularly at risk of corruption and these must be updated at regular intervals. An increased risk of corruption is, for example, given in the case of jobs that manage large amounts of funds in the awarding of contracts, public funding, grants or the like, or that regularly finalise or commission the drawing up of performance specifications.

There is also an increased risk of corruption where there is the possibility of influencing factual determinations or audit results without the involvement of third parties, where responsibilities / tasks are concentrated in one or a few people and where there is frequent external contact with a certain group of people who can expect advantages or disadvantages from the decisions made by the employee.

---

The internal control system (ICS) is the responsibility of the executives in the respective area of responsibility with regard to technical design and consistent application.

**The ICS includes:** a) separation of functions, b) several pairs of eyes principle, c) submission requirements d) value limits and e) co-signing rules. The ICS of an organizational unit must be appropriately documented.

With regard to the determination of a possibly increased risk of corruption and the associated risk analysis, the executives of the respective organizational units are also responsible and explicitly responsible. A) to d) above are mandatory in this regard. The work organization in structure and processing must be regularly checked critically and adjusted if necessary.

The managers of the organizational units are called upon to raise awareness in the context of corruption prevention and to exercise supervision and control accordingly.

Identified problem areas or security gaps must be countered immediately with suitable and sustainable measures. The appointed anti-corruption officer is available for advice.

### **Organizational measures to combat and prevent corruption are:**

#### **Unannounced controls**

With regard to existing rules or regulations, unannounced controls should be carried out by superiors or, after consultation with the Presidium or the Executive Board, by the Audit & Organization department. If necessary, the Presidium or the Executive Board can commission special audits. The result as well as the initiated remedial measures must be documented or logged.

#### **Several pairs of eyes principle and transparency**

The several pairs of eyes principle, i.e. the participation of several employees or organizational units by way of co-checking, must be ensured. The so-called 4-eyes principle is the minimum standard. If there are insurmountable organizational difficulties, the co-examination can be limited to random samples. Alternatively, other measures to prevent corruption, for example, are to be provided in the form of more intensive administrative or functional supervision. If necessary, routine, case-by-case or unforeseen audits must be scheduled. Transparency in the decision-making process as well as in the handling of the process must be ensured. For this purpose, clear rules of responsibility, administrative instructions, procedural instructions, organizational manuals, a comprehensive reporting system as well as suitable documentation procedures, the EDP / IT-supported process control / control, written notes, routine reports or meeting notes / protocols as well as proper record keeping / - to provide storage or corresponding signing channels.

#### **Separation of planning, awarding and invoicing**

The preparatory planning and description of requirements required for the procurement of deliveries, services, construction work, etc., as well as the implementation of the awarding procedure and the final invoice processing or billing must each to be done by separate work areas / organizational units.

#### **Separation of duties**

---

Specialized or industry-standard as well as specific organizational requirements with regard to the separation of functions to be guaranteed must be observed. Exceptions, for example, due to the specific structure or procedural organization or the staffing, are possible if it is guaranteed that traceable and controlled procedures are still used. To this end, the superiors are advised to examine the fundamental auditability. Any deviation from the principle of functional separation must be justified in writing by the responsible head, reported to the next superior for approval and coordinated with the Audit & Organization department. For this purpose, the recommendation applies to critical tasks / actions that are principally subject to a several pairs of eyes principle, establish value limits, and / or signatures in the form of suitable administrative / procedural instructions. The Audit & Organization department is available to provide advice on auditing.

### **Rotation**

For workplaces / areas that are particularly at risk of corruption, we recommend a change of workplace (rotation) at specific time intervals. Here, the organizational possibilities with regard to staffing must be weighed against the risk or the special need for protection must be decided by the head of the department. If a rotation principle is indicated but not feasible, the responsible department head must ensure the highest level of awareness and training regarding the recognition of possible corruption risks. The reasons should be documented. The appointed officer for corruption matters is available to advise on this.

### **Instruction**

In special areas at risk of corruption, regular instructions must be given about the injustice and the consequences of corruption under civil service law and criminal law, as well as about the regulations regarding the acceptance of rewards, gifts and other benefits. Appropriate instruction is given in connection with recruitment, where relevant with the taking of an oath or pledge. The instruction is to be repeated on the occasion of the implementation and the transfer of the employees to an area that is more at risk of corruption. The Presidium or the Executive Board are responsible for this obligation. The performance of this task can be delegated. The instruction procedures must be documented.

### **Obligation**

If private companies (e.g. architects or engineering firms) are involved in the execution of public-sector tasks, the people in these companies - if necessary - are obliged to conscientiously fulfil their obligations under the contract according to the law on obligations. This achieves equality under criminal law with public officials. The Presidium or the Executive Board of are responsible for the obligation. The performance of this task can be delegated. The obligation must be formally documented.



---

### 6. Anti-corruption officer

The anti-corruption officer is to be appointed by the UNI Presidium and the UMG Executive Board. The appointment must be made public Foundation-wide. The anti-corruption officer is the interlocutor for the Presidium or the Executive Board, the employees, the students or third parties.

The anti-corruption officer has a direct right to speak to the Presidium or Executive Board. He /she will be informed in good time and comprehensively so that his/her tasks can be carried out in accordance with the mandate.

The anti-corruption officer must maintain confidentiality about the personal circumstances of employees that have become known to him or her, even after the end of their term of office; this does not apply to the executive bodies and the personnel administration as well as to persons who carry out investigations in disciplinary proceedings in the event of a suspicion of corruption justified by facts. The silence does not apply to the law enforcement authorities and the financial control authorities according to § 95 LHO.

Files with personal data that are created by the anti-corruption officer are to be treated like personnel files with regard to administrative and organizational measures. In deviation from the filing rules, they are to be destroyed if the individual processes are no longer required for the purpose of fighting or preventing corruption.

#### **The other tasks of the anti-corruption officer include:**

- Promotion of awareness amongst employees by providing advice and information
- Making proposals to the Presidium or the Executive Board on how to proceed with internal investigations, on measures against concealment and on informing the public prosecutor's office in
- the event of a suspicion of corruption justified by facts
- Advice on the acceptance of donations, gifts and sponsoring
- Maintaining contact with and exchanging information with the supervisory authorities
- Cooperation with law enforcement agencies on general anti-corruption issues

### 7. Conduct in the event of suspected corruption

The employees of the University of Göttingen Foundation are required to notify us if they have or have received traceable evidence of corrupt behaviour at the University of Göttingen Foundation under public law. As a rule, they report this to their overall superior, who is responsible, or to the management of the organizational unit concerned (e.g. head of purchasing). If the official channel is not indicated, the report should be made via the whistleblowing system established at the UMG (BKMS® system) or via the anti-corruption officer.

For the further procedure (including the case of a suspicion of corruption against members of the Executive Board), the regulations of the "procedural instructions of the UMG Executive Board for

---

reporting and investigating rule violations that are reported anonymously or via the BKMS® system" of 24.09.2019 apply with the following requirement: If there are concrete indications of corruption, the Executive Board informs the law enforcement authorities immediately in addition to the Foundation committee.

The Presidium and the Executive Board support the investigations of the law enforcement authorities with all means at their disposal. They appoint a person who coordinates the investigations vis-à-vis the law enforcement authorities externally and internally (within the Foundation). This should preferably be the head of the Audit & Organization department.

The involvement of the law enforcement authorities is the responsibility of the Presidium or the spokesman for the Executive Board in coordination with the respective legal department of the relevant part of the Foundation and the Audit & Organization department. To support the law enforcement authorities with searches and seizures, the University of Göttingen Foundation under public law offers a "scout function" via the management of the Audit & Organization department.

If necessary, further internal investigations will be carried out exclusively in coordination with the law enforcement authorities.

Disciplinary and labour law procedures are to be pursued with vigour and accelerated if there is suspicion of corruption. Claims for damages against employees and third parties must be carefully and comprehensively checked in each case and consistently enforced.

## 8. Involvement of staff representatives

In all measures to prevent and fight corruption, the Presidium or the Executive Board works together with the staff representatives in a trusting manner.

## 9. Donations from private third parties (sponsoring, donations, etc.)

Regarding the handling of donations from private third parties, please refer to the "Guidelines for the Handling of Private Third-party Donations of the University Medical Centre Göttingen" and the "Guidelines for University Funding" and "Guidelines for Handling of Private Third-party Donations" of the Georg-August University Göttingen Foundation under public law in the current version. This represents the regulatory framework. The procedure for the acquisition, acceptance and use of donations including the creation of transparency, is regulated there.

---

### 10. Acceptance of rewards, gifts and other benefits

With regard to the handling of rewards, gifts and other benefits, the Executive Board and Presidium recognize the state's circular on the "Prohibition of Accepting Rewards, Gifts and Other Benefits" - dated November 24, 2016 as well as the amendment announcement for 2020.

### 11. Representation tasks

For the members of the Presidium of the UNI or the Executive Board of the UMG as well as the management of the units directly assigned to them (departments and staff units) or business areas of the 1st management level, representation tasks are carried out within the scope of the exercise of management tasks and the associated external presentation of the University of Göttingen Foundation under public law or its areas of responsibility within the framework of these guidelines and the above-mentioned provisions for accepting rewards, gifts and other benefits. This includes only the usual hospitality at events on official behalf or the social obligations imposed by the position (e.g. introduction and departure of people in a special situation / position / task, receptions, social events, those serving official interests, anniversaries, laying of the foundation stone, topping-out ceremonies, inaugurations, openings and exhibitions as well as meetings of bodies of economic companies in which the University of Göttingen Foundation under public law is involved). Participation on the occasion of or in honour of the occasion of official activities, meetings, conferences, workshops, visits, etc. is also recognized as representation tasks. The prerequisite here is that these are customary and appropriate or have their reason in the rules of social intercourse and courtesy.

With regard to the 2nd hierarchy level, the managers are requested to take suitable measures in accordance with the above-mentioned requirements. These measures are to be met and ensured.

The members of the UNI Presidium and the UMG Executive Board shall notify the Presidium or the Executive Board and if necessary the chairman of the respective Foundation committee, if representational tasks are to be performed which go beyond the above-mentioned occasions. If necessary, the anti-corruption officer is to be consulted in an advisory capacity. The applicable legal travel expenses regulations must be observed.

### 12. Award of public contracts

The award of public contracts may be exposed to the risk of corruption due to the sometimes not insignificant extent of the service in question. In order to ensure a proper and, in particular,

---

transparent procedure, the relevant (procurement) law and competition law regulations and principles<sup>3</sup> must be observed without fail.

### 13. Coming into effect

This directive comes into effect on the day of publication in the Official Bulletin 1 and shall repeal "previous directives" in particular the Anti-corruption Directive in the version of November 25, 2010 (Official Notices 1/2011 p. 3) which will no longer be in force. At the same time the anti-corruption officer will make the directive available to all executives promptly and in a suitable manner.

Göttingen, on 30.11.2020

Signed:

Prof. Dr. R. Jahn  
President

Prof. Dr. Med. W. Brück  
Head of Research & Teaching,  
Spokesman of the UMG Executive Board  
Dean of the Medical Faculty

---

<sup>3</sup> E.g. §§ 1.97 Law against Restraints of Competition (GWB) demands the principle of competition, offer of equal treatment, requirement of transparency, principle of economic offer; Prohibition of cartel agreements. The public procurement law includes: contracting regulations for services (VOL), for construction work (VOB), for freelance professions (VOF), EU public procurement law, fee regulations for architects and engineers (HOAI) as well as supplementary provisions issued for them.

### Annex 1 to the ACD

#### Code of Conduct against Corruption

This Code of Conduct is part of the anti-corruption guideline of the Lower Saxony State Government (Nds. MBI 16/2014, page 334). All employees of the University of Göttingen are therefore advised to follow the regulations and implement them conscientiously.

**1. Be a role model: Show through your behaviour that you neither tolerate nor support corruption.**

Corrupt behaviour damages the reputation of the public service. It destroys trust in the impartiality and objectivity of the state administration and thus the basis for living together in a state community.

All employees therefore have the task of setting an example for colleagues and citizens through their behaviour. All executive personnel have a special responsibility in the fight against corruption.

**2. Repel any attempts at corruption and inform your superiors or the contact person for the fight against corruption immediately.**

For external contacts, for example, with applicants or during control activities, you must create clear relationships from the start and immediately ward off any attempt at corruption. Therefore, strictly adhere to the law and the administrative regulations prohibiting the acceptance of rewards or gifts. Never give the impression that you are open to "small gifts". Do not be afraid to refuse or return a gift with a request for understanding of the rules that apply to you. It also makes sense to have the Personnel Department return a gift with clarifying words. This makes it all the more clear to the recipient that the office is rejecting a certain donation and not just a single person.

In the event of attempts at corruption, inform your supervisor or the contact person for the fight against corruption immediately. Protect your colleagues by consistently disclosing attempts at corruption by outsiders.

**3. If you suspect that someone is trying to ask you for preferential treatment that is contrary to your duty, call in a colleague as a witness.**

**4. Work in such a way that your work can be checked at any time.**

The way you work should be transparent and accountable for everyone.

**5. Pay attention to a separation of service and personal life. Check whether your private interests conflict with your official duties.**

Attempts at corruption are often started when third parties extend business contact to private contacts. In the case of private contacts, you should therefore make it clear from the outset that you must strictly separate business and private life in order not to be suspected of accepting benefits.

If you recognize a possible collision between your official duties and your private interests or the interests of third parties with whom you feel connected, inform your superiors about this so that they can react appropriately and you can, for example, be exempt from job activities in specific individual cases.

In the case of secondary jobs that you do – including those that are voluntary - there must be a clear separation between the service and the secondary employment.

**6. Support your agency in discovering and investigating corruption. Inform your superiors or the contact person in the fight against corruption whenever there are any indications of corrupt behaviour.**

Corruption can only be prevented and fought if everyone feels responsible for their office and pursues the “corruption-free office” as a common goal.

**7. Support your office in recognizing faulty organizational structures that encourage attempts at corruption.**

All employees are requested to provide the organizers with relevant information in order to contribute to clear and transparent work and procedural processes.

**8. Be open to further training on the subject of corruption prevention.**

Training will make you feel confident to deal aggressively with corruption.

### Annex 2 to the ACD

## What is allowed and what is not?

Civil servants are fundamentally prohibited from demanding rewards, gifts and other benefits for themselves or third parties in relation to their official activities, as well to be promised something or accept (Section 42 Civil Service Status Act).

According to the joint circular of November 24, 2016 (Nds. MBl. P. 1166), this applies equally to employees and those employed in the public service and those doing their vocational training in public service.

The Presidium of the university and the Board of the university medicine have declared the joint circular of November 24th, 2016 (Nds. MBl. P. 1166) to be applicable at the University of Göttingen.

### 1. Basics

In principle, donations may only be accepted if either the approval of the competent authority has been given or general approval has been given by virtue of the joint circular.

### 2. What is generally permitted?

Approval, based on the joint circular, has already been given for

1. the acceptance of gifts that are generally considered to be of low value (e.g. simple mass promotional items such as pens, calendars, writing pads), in as much as their total value does not exceed € 10 and so far as the donation is not repeated per donor in the calendar year,
2. the acceptance of gifts from the business environment (e.g. class pupils of a teacher - but not an individual - on the occasion of a birthday, service anniversary or a farewell) to a conventional and reasonable extent,
3. the acceptance of gifts from colleagues in the conventional and appropriate scope,
4. the usual, appropriate hospitality on an occasion or on the occasion of official activities, meetings, official visits and the like, or if they are based on the rules of social intercourse and courtesy, which a civil servant cannot avoid, without going against social norms
5. the usual hospitality at general events in which the civil servant participates in the exercise of his or her office, on official duty or with consideration of the social obligations imposed by the office (e.g. social events that serve to uphold the employer's interests, introduction or farewell of officials, official receptions, anniversaries, laying of the foundation stone, topping-out ceremonies, inaugurations, openings, meetings of bodies of economic enterprises in which the public sector is involved); thereby the representation of an authority at social events is limited to the executive authority or those officials commissioned by it,

6. the public acceptance of bouquets of flowers at events in which the civil servant takes part in a prominent manner in the exercise of his or her office, on official duty or with consideration of the social obligations imposed by the office and in which the value of the bouquet is within conventional limits and is appropriate for the situation

7. Discounts that are granted on the basis of agreements under private law (e.g. membership in a club/society which, alone or in addition to other purposes, offers a discount) for purely private transactions, if the appearance of influencing the discharge of his/her office is avoided (e.g. fuel bonus points for members of an automobile club, not however only for a certain professional group in the public service; discounts at a hardware store for all residents of a community, but not only for members of a local office), services that facilitate or accelerate the implementation of official business (e.g. collection by car from the train station or airport); the service is to be reported to the office and does not release the person from having to provide travel expense information.

### 3. What is allowed in exceptional cases?

In addition, the Audit & Organization unit may approve the acceptance up to an equivalent value of €50 per individual case. In special cases, approval by the highest administrative authority or their representative can approve the acceptance up to the value of over €50 per individual case.

In order to avoid the mere appearance of being susceptible to personal benefits, approval must be requested in writing or by email before accepting benefits.

If the approval cannot be given in time, the civil servant may, exceptionally, provisionally accept the grant, but must apply for approval immediately. Approval is given in writing or by email.

### 4. What is not allowed?

Due to the general risk of appearing to be receptive to private benefits, accepting the following services is strictly prohibited:

1. Cash (also for the cash register) or cash-like gifts  
(e.g. vouchers, admission tickets, telephone or cash cards, tokens),
2. Personal discounts of all kinds  
(also, the leaving of objects under special conditions),
3. Sexual acts (both performance and tolerance),
4. Acceptance and transfer of benefits to third parties  
(e.g. donation to relatives, employees, clubs).

### 5. Awareness issues



In order to be able to initially assess whether a reward, a gift or any other benefit is or should be granted exclusively in relation to the business activity, the following two questions can be asked:

**Would I receive the gift if I was not a university employee in my current position?**

**Do I have any contractual or other claim to a benefit, a gift, or any other advantage from my employment contract?**