

Anti-corruption policy

Objective

Copenhagen Business School (CBS) is a governmental, independent institution, and just as in the rest of the public sector, openness, democracy, due process, objectivity, integrity, impartiality and requirements for statutory regulation are fundamental values.

CBS takes strong exception from corruption. Efforts to combat corruption are crucial, as the university holds a pivotal position in society. It functions daily within both national and international frameworks, where upholding fundamental values is integral to fulfilling its essential societal role.

The purpose of this policy is to establish a framework promoting ethically correct behaviour among all of CBS' employees, protect the reputation of the university as well as leaders, employees and our collaborative partners by having a clear, common understanding of our ethical standards.

All employees at CBS are subject to this policy and required to adhere to its provisions.

What is corruption?

Corruption is defined as the abuse of entrusted power for personal gain and includes bribery, extortion, nepotism, disqualification, fraud and embezzlement.

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 (disqualification).

The individual types of corruption will be elaborated below.

Corruption undermines the integrity of CBS' 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 the acceptance and offering of bribes as well as other forms of active or passive corrupt behaviour.

Types of corruption

Bribery

Bribery includes 'offering, giving, receiving or soliciting anything of value with the intention of influencing someone to act or refrain from acting in a way that is illegal or in any way contrary to their duties.'

Bribery can be active or passive. Bribery is considered active when it involves giving, offering, or promising a bribe, and passive when it involves requesting or accepting a bribe. It is a criminal offense for public employees to accept gifts at all, whether there is an expectation of something in return or not.

Any payment, whether in the form of cash, gifts, travel or other benefits that personally benefit the recipient or their next of kin, is considered a bribe.

In principle, public employees are not allowed to receive gifts or other benefits from citizens or companies in a professional context.

For more information about gifts and other benefits you are permitted and prohibited from accepting, please refer to the [Code of conduct in the public sector](#) from the Danish Employee and Competence Agency and [CBS' gift policy](#).

Extortion

Extortion is when someone uses threats of violence, disclosure of sensitive personal data or other wrongful acts to obtain money or other benefits.

Nepotism

Nepotism is favouritism of family, friends and acquaintances in employment or other activities. Nepotism is a special type of power abuse, where those in power give preferential treatment to family and friends over relevant experience, education or qualifications.

Conflict of interest (or disqualification)

A conflict of interest (or disqualification) is a conflict between two or more interests. A conflict of interest often arises where private interests conflict with their professional duties. When these two interests conflict, the individual might find it difficult to act impartial when choosing between the interests.

Such individual is often declared disqualified. In the public sector, this means that the individual is not allowed to participate in the processing of a case where they may have any personal interests that could compromise their impartiality or influence the outcome.

S. 3 of the Danish Public Administration Act regulates disqualification and generally stipulates that any person acting within public administration shall be disqualified relative to any specific matter if:

- such person is particularly interested personally or financially in the outcome of the matter or represents any person who is thus interested,

- such person's spouse or next of kin is particularly interested personally or financially in the outcome of the matter,
- such person takes part in the management of or is otherwise closely related to any company, partnership, association or other private legal entity particularly interested in the outcome of the matter.

This rule also applies if any circumstances raise doubts of the impartiality of the individual.

Clearly, it is not wrong to have personal interests, however, it is important that personal and professional interests are kept separated.

Fraud

Fraud is financial crime covering some kind of swindle, deception or falsification, e.g. when an employee tricks clients or companies for personal gains.

Embezzlement

Embezzlement, also called peculation and wilful mismanagement, is the act of misappropriating funds entrusted to someone's care, typically in a position of trust or responsibility, either directly, where funds are withdrawn from the register or bank account, or indirectly, where funds are used for personal gain through falsified vouchers.

Consequences of violations

The vast majority of corruption will be subject to sanctions, cf. the provisions of the Danish Criminal Code. Additionally, violating the rules may have consequences for the individual's employment, proportionate to the severity of the violation.

Reporting

Reports of corruption or any other criminal activity may be made directly to the immediate manager or, if necessary, to the manager's manager.

[CBS' whistleblower scheme](#) can also be used if the notifier wishes to be anonymous.

Approved by University Director Arnold Boon, 28 November 2024.