

Appendix 1

Guidance for Engaging Individuals or Entities Working with Foreign Officials

A Third-Party Representative is an individual or entity engaged by DePaul University specifically to work with a Foreign Official on DePaul's behalf. No one may engage a Third-Party Representative on behalf of DePaul without prior written approval from the applicable Executive Officer.

In order to obtain approval to engage a Third-Party Representative, please provide the following information to the applicable Executive Officer:

1. Individual and department requesting approval

2. Third-Party Representative name, location, and name of owner or shareholder (if applicable)

3. How were you referred to the Third-Party Representative (e.g., through a Foreign Official)?

4. Which DePaul employee will supervise the work done by the Third-Party Representative?

5. Description of the Third-Party Representative's background and qualifications

6. Description of due diligence conducted regarding the Third-Party Representative

7. Explanation of work to be done by Third-Party Representative

8. Compensation to be provided to the Third-Party Representative

9. Country(ies) or territory(ies) where work will be performed

10. What, if any, foreign government agency(ies) will be required to approve or license work done by the Third-Party Representative on behalf of DePaul?

11. Does the Third-Party Representative have any association(s) with any Foreign Official, including a relative?

12. Has the Third-Party Representative reviewed the International Anti-Bribery and Corruption Laws Compliance policy?

13. Has the Third-Party Representative signed the Anti-Corruption Certification?

14. Do you have any reason to believe that the Third-Party Representative may not comply with the International Anti-Bribery and Corruption Laws Compliance policy?

15. Are you aware of any “red flags” in the Third-Party Representative’s business dealings (e.g. lack of appropriate staff or expertise, lack of physical office space, family or business ties to government officials)?

APPROVAL

Signature: _____

Name: _____

Date: _____

Forward signed copies to the Office of the Associate Provost for Global Engagement

Appendix 2

Anti-Corruption Certification

I, _____, a duly authorized representative of _____ [Third-Party Representative], confirm that I, my organization, and anyone retained by me or my organization, will strictly adhere to and comply with all applicable laws, rules and regulations, including but not limited to local and international anti-bribery and anti-corruption laws such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act (collectively, Anti-Corruption Laws). In this regard, I have reviewed and understand the contents of the attached International Anti-Bribery and Corruption Laws Compliance policy.

I confirm that neither I nor my organization is a governmental entity or political party in the country in which I represent DePaul University, and that no officer, director, stockholder, employee or agent of my organization is: (i) an officer or employee of a government or any department, agency or instrumentality thereof (including a government-owned or government-controlled state enterprise or a state-run health care facility or system) or of a public international organization, such as the World Bank; (ii) a person acting in an official capacity for or on behalf of a government or government entity or of a public international organization, any political party or party official or any candidate for political office (including, for example, employees of companies owned or controlled by governments, civil servants, administrative and judicial officers, and members of the military).

In connection with activities on behalf, or in the interest, of DePaul, neither I, nor my organization nor any of its officers, directors, stockholders, employees or agents have offered, paid, promised to pay, or authorized – and will not offer, pay, promise to pay, or authorize – the payment of any money or the giving of any other thing of value to any individual with the intention of inducing improper conduct on the part of the recipient or securing an undue or improper advantage for DePaul.

I confirm that, if I learn of or have reason to know of any activities in connection with the representation of DePaul that may constitute a violation of an Anti-Corruption Law, I will immediately advise the DePaul Office of General Counsel at 1 East Jackson Blvd., Chicago, Illinois 60604, jpadill7@depaul.edu, 312-362-8865.

I also authorize DePaul to use any information contained in this Certification and any related information provided by my organization for the purpose of determining whether I or my organization will be retained by DePaul.

Completed by:

Third Party Representative Signature: _____

Printed Name: _____

Title: _____

Organization: _____

Date: _____