

POLICY ON DUE DILIGENCE RELATING TO INTERNATIONAL PARTNERSHIPS, COMMERCIAL PROJECTS & PHILANTHROPY

Policy Category:	Governance
Subject:	Risk management related to International Partnerships
Approving Authority:	President & Principal
Responsible Officer:	President & Principal or designate
Responsible Office:	International
Related Procedures:	Procedures on Due Diligence relating to international partnerships Procedures relating to the control and investigation of fraud, theft, bribery and corruption (Fraud response plan)
Related College Policies:	Policy on fraud, theft, bribery and corruption Policy on acceptance of gifts
Effective Date:	7 th February 2019
Supersedes:	N/A
Next Review:	31 st July 2021

1. Purpose & Scope

- 1.1 This policy is intended to help the university with decision-making and to operate within its risk appetite statement, by creating a consistent approach across the institution to conducting due diligence and assessing risks related to international partnership opportunities. The approach includes regular reporting through established management and governance structures.
- 1.2 This policy will also ensure that decisions are made at the appropriate level of the organisation with a proportionate level of debate and consideration, and that these decisions are documented, reported and transparent to senior leadership and Council
- 1.3 The policy applies to all staff at King's engaged in the identifying, scoping and development of international relationships.

2. Policy

- 2.1 In line with King's Gift Acceptance Policy, King's will not accept income from or enter into any form of formal relationship with third-parties which are judged to be unethical or to put the reputation of King's at unacceptable risk.
- 2.2 King's will create and manage a single view of our international commercial pipeline and live projects noting the status of these projects with regards to due diligence and approvals.
- 2.3 All pipeline projects will undergo early screening due diligence and be escalated for debate if risks are evident.
- 2.4 A subcommittee of the Enterprise Risk Management Committee will be established with delegate authority to debate partnerships if high levels of ethical and reputational risk is evident and to recommend approvals to the Principal, Audit, Risk & Compliance Committee and College Council
- 2.5 The same due diligence processes, including reporting, will apply to all international philanthropic projects.
- 2.6 This Policy will be reviewed annually.