



Anti-Fraud, Corruption & Bribery Policy

Purpose

In accordance with the laws of Pakistan, Iqra University strictly adheres to all anti-bribery, anti-fraud, and anti-corruption legislation and has zero tolerance for fraud, bribery, corruption and any form of dishonesty in its transactions. Wherever the University employees and associated parties operate, they must follow Pakistan's legislation.

The policy aims to foster a culture of honesty, integrity, and professionalism. It outlines the obligations and provides information and assistance on how to identify and manage such concerns.

Scope

The policy applies to overall Iqra University's faculty, staff, students, volunteers, trainees and all workers whether remunerated or not. The policy is further extended to third party contractors, suppliers and intermediaries, nonetheless all associated parties associated with whom university have commercial partnerships.

Definition of Bribery, Corruption & Fraud

Bribery is defined as the act of promising, providing, or accepting any benefit, financial or otherwise, in order to persuade the recipient or another individual to perform their duties dishonestly, to reward them for acting dishonestly, or in instances where the recipient would act dishonestly if the benefit was accepted.

Corruption is the abuse of entrusted power or position for private gain.

Fraud is the intentional deception of another person in order to achieve an unfair or illegal advantage, breach another person's constitutional freedoms, or both. Fraud is often defined as the intentional fabrication of financial statements or other accounting documents by personnel within or outside of the University (or acting in conjunction with one another) to hide asset theft or to promote another aim.

Introduction

Iqra University is committed to carrying out all of its operations in a moral and honest manner. Fraud, bribery, and any other sort of dishonesty in our practices and procedures are not tolerated. It is to encourage a culture of sincerity, reliability, and professionalism.

The aim of the policy is to ensure that all associated parties of the Universities whether remunerated or not will conduct their business honestly and without resorting to any corrupt practices or acts of bribery to gain an unfair advantage.

More than a cultural commitment, Bribery is a criminal offense across the world, and corrupt acts expose the University and its personnel to prosecution, fines, and imprisonment, as well as harming the University's reputation. The policy defines Bribery in all its forms and outlines the rules to adhere to within University's premises as well as our principle of 'zero tolerance' against any violation that may arise, and could result in disciplinary action as deem appropriate.

Policy Statement

- We at Iqra University always act honestly and ethically in all of our business dealings. We have a zero-tolerance policy for corruption, bribery, fraud, and other financial irregularities and are dedicated to conducting ourselves in a professional, ethical, and honest manner at all times. wherever we operate, in our commercial interactions and partnerships, as well as in adopting and putting in place efficient systems to stop any corruption or bribery.
- We will uphold all laws pertaining to bribery, corruption, and fraud prevention as subject to Pakistan legislation.
- This policy's objectives are to:
 - Define our roles in observing and upholding our stance against corruption, bribery, fraud, and other financial irregularities; and
 - Inform and direct individuals who work for us on how to identify and address corruption, bribery, and fraud issues.
- It should be emphasized that the University faces a variety of bribery and corruption threats across all of its activities, operations, and geographic locations, much like other higher education institutions in Pakistan. Bribery in connection with applications, tests, awards, contracts, joint ventures, and construction are only a few of these threats.
- In this policy, "third party" refers to any person or entity you interact with while working for us, including current and prospective clients, customers, suppliers, distributors, business contacts, agents, and advisers as well as governmental and non-governmental organizations, as well as their advisors, representatives, and officials, as well as politicians and political parties.

University's Responsibility

- The University holds responsibility for making this policy known to its personnel and those who provide services to the University, whether paid or not, and for providing assistance and direction to facilitate adherence to it.
- This policy ought to be made available to and discussed with parties with whom the University has or is considering doing business to ensure they understand the University's standards.
- The University will establish adequate procedures to avoid bribery, which are intended to supplement other measures taken by the University to ensure probity and the proper conduct of University business.
- The University will not sign contracts and/or partner with any third parties and/or intermediaries who have been involved in the past or are suspected of giving or accepting bribes.
- Any employee and/or worker (as described above) who violate this policy will face disciplinary action from the University or its affiliated enterprises. This includes the punishment of dismissal without cause in cases when workers offer or accept bribes. Those partners providing services to the University who do not follow this policy or related anti-corruption standards may face similar consequences, including termination.
- Develop and implement monitoring indicators for institutional adherence to the policy; this may include; internal reporting, periodic risk assessment to review and mitigate any emergent risks of non-compliance.

Each Person affected by this policy is expected to;

- Understand and comply with it in full spirit, this also includes using the stated method to report a concern as soon as possible if a violation of the policy has occurred, is suspected of occurring, or may occur in the future.
- Not only follow the stated rules, but also to avoid and reject participation in any such circumstance that may represent, for an onlooker the presence or perception of undue influence or conflict of interest.
- Must report, seek approval for, and retain a written record of all hospitality, gifts, travel charges, and other expenses in line with this policy.
- Subjected to disciplinary action, in case of violation which might lead to dismissal for egregious misconduct. Failure to disclose corrupt activities by others can result in disciplinary action, particularly if there is evidence of an attempt to cover up or disguise other wrongdoings.

Protection Against Adverse Action

The University is obligated to ensure that a complainant will not suffer any negative consequences or be victimized in any other way because they provided information or aid during an investigation in accordance with the policy. A person is deemed to have been victimized if the individual has been (i) fired, (ii) suspended, (iii) denied promotion, (iv) demoted, (v) made redundant, (vi) harassed, (vii) intimidated, (viii) threatened with any of the things mentioned in to, and (ix) subjected to a discriminatory or other adverse measure by the employer or a coworker.

Any person can reach out to the Office of the Registrar, Director Human Resources and Director Finance for redressal if they believe they are being victimized or are likely to be victimized as a result of filing a complaint, disclosing information, or providing assistance in an investigation as required by the policy. The Competent Authority will then take the appropriate action and may provide the concerned Personnel or Organisation with the necessary instructions to prevent the victimization or avoid it.

Complaint Lodging Procedure

Complaints must be lodged formally, in writing, by the individual making the complaint. The complaint should include the complainant's full name, their role or position within Iqra University and contact details. The complaints can be submitted by any of the following secure and dedicated complaint methods as illustrated in **Policy for Lodging Complaints** that directly reach out to a member of the Disciplinary Committee responsible for the ethical compliance of the University.

Via email at:

complain.employee@iqra.edu.pk - (For Employees of Iqra University)

complain.students@iqra.edu.pk - (For Students of Iqra University)

Or via call at dedicated Helpline: 02138734088

Anonymous Complaints

Any complaint made by an individual must include their identity. Anonymous concerns may be given less weight, however the University may nonetheless take them into consideration.

The following considerations will be made when exercising this discretion:

- the seriousness of the concerns presented;
- the veracity of the issues; and
- the possibility that other reliable sources will confirm the claim.

Investigation Procedure

- All reported complaints are reviewed initially to ascertain the following:
 - The significance and urgency of the matter;
 - Whether sufficient information is presented to start a review; and
 - Allocation of the matter to the best suitable office appropriate to handle the concern given the nature and subject matter of the complaint.
- After the initial review, if investigation is warranted, a Disciplinary Committee is formulated as prescribed in Academic Policy to conduct and/or coordinate the investigation of the complaint.
- The investigation process follows the same procedure as mentioned in the Academic Policy.
- In case the member of the Disciplinary Committee determines that the matter does not concern the policy and/or information or evidence related to the complaint is insufficient, the case will be documented and closed until such time that further information surfaces that suggests otherwise. The complainant will be informed in the due course in such a case. However, if the complainant feels the judgment of the decision is incorrect or unfair processing of the case, they could raise their concern(s) in writing to the Vice Chancellor.

Disciplinary Committee

The IU Disciplinary Committee is responsible for all ethical compliance within the campus, along with complaints handling and disciplinary action related to; but not limited to disclosure, misconduct, harassment, bullying, and discrimination. The disciplinary committee(s) are formulated on a case by case basis as illustrated in the **Academic Policy**.

Confidentiality

All such complaints will be handled sensitively and confidentially by the University. The person's name shall be kept private, if at all feasible, and as long as doing so won't obstruct or jeopardize any investigations. The disclosure maker may be required to provide a statement as part of the evidence needed, either as part of the University's investigations or any subsequent external investigations (for instance, if the disclosure prompts criminal investigations). The investigation process may reveal the source of the information.

Wrongful Allegation

Any University employee who makes an unsubstantiated allegation while acting in the public interest requires a reasonable belief that the information disclosed demonstrates one of the potential concerns described in the Policy's Scope. If this is the case, no action will be taken against the employee.

If someone is found to have made malicious or vexatious accusations in a particular situation, disciplinary action may be taken against them in line with the relevant Disciplinary Procedure of University.

Record Keeping

Reports on all complaints and investigations will be maintained through the dedicated, secure mechanism of the Office of the Registrar for a duration of three years. All concerns expressed and responses to complaints will be documented.

Policy Review

This policy will be reviewed periodically to ensure its effectiveness and to make necessary updates as required.

Approval and Amendment

This policy is approved by Iqra University’s governing body. Amendments to this policy can only be made with the approval of the governing body.

Document Control

This document is controlled by Iqra University’s governing body. The latest version of the document will always be available from Iqra University’s official website or upon request.

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Associated Policies	Academic Policy (Page No. 26) Policy for Lodging Complaint Public Interest Disclosure (Whistleblowing) Policy