Anti-bribery and corruption policy of Al-Mustaqbal University

Policy Name	Anti-bribery and corruption policy
Code	ABCO-V1
Description of Policy	A policy affirming the University's commitment to preventing and combating corruption, bribery, and fraud; promoting integrity, transparency, accountability, ethical conduct, and compliance with applicable Iraqi laws; and establishing responsibilities, reporting channels, investigation procedures, and protection for whistleblowers
Policy Applies to	All individuals working at all levels of the University, including senior managers, the President, deans, department heads, employees, temporary and permanent workers, consultants, volunteers, interns, agents, affiliates, and others working on behalf of or associated with the University; wherever they are. The policy also addresses students and relevant stakeholders in its provisions.
Policy Status	Approved and adopted by the University Council; applicable throughout the University.
Final Approval Authority	President of the Council of Al-Mustaqbal Universit
Governing Authority	University Council of Al-Mustaqbal University
Approval Date	July 2023
Effective Date	July 2023 (the stated start date)
Date of Last Revision	July 2025
Date of Next Revision	July 2027

جامعة المستقبل
AL MUSTAQBAL UNIVERSITY

Article 1

Al-Mustaqbal University seeks to be a global educational institution that contributes to the progress of humanity, based on the core values of integrity, transparency, and accountability, in addition to a passion for excellence, dedication to duty, and social justice. This vision and values are opposed to the phenomenon of corruption.

Therefore, the University is fully committed to fighting corruption in all its forms through all its decisions, actions, and practices, and we strive to thwart any illegal attempt by any individual or entity within the University or while dealing with external stakeholders. The University also does not tolerate bribery and fraud and will take the necessary measures to prevent them from occurring in all its activities.

Article 2

Corruption is a broad concept that encompasses many practices, including:

1. Misuse of positions for personal gain, such as bribery, fraud, extortion, embezzlement, nepotism, and tribalism, as well as breach of trust, theft, and misuse of university resources.
2. Bribery and fraud are complex legal terms, and Iraqi laws do not include a specific definition of either, as the Iraqi legislator left this task to jurists and researchers.
3. Bribery refers to the offering, promise, request, or receipt of something of value to influence an action or decision.
4. Bribery expresses any incentive or reward offered to another person for a commercial, contractual, regulatory, or personal advantage.
5. A bribe is not limited to the act of offering it; accepting it is also a violation of the law.
6. Bribery is illegal, and employees should not engage in any form of bribery, either directly or indirectly, or via a third party (such as agents or distributors). In particular, employees should not bribe any foreign government official anywhere in the world.
7. If employees are unsure if something is a bribe, gift, or hospitality, they should seek advice from the head of the university's legal services.

جامعة المستقبل
AL MUSTAQBAL UNIVERSITY

Article 3

Bribery and fraud by our staff or students acting on behalf of Al-Mustaqbal University will be considered serious disciplinary offenses. Staff and persons associated with the University are expected to adhere to the following standards:

1. No financial or other benefits may be sought through bribery.

2. In all activities carried out in the name of the University, any form of fraud must be refrained.

Article 4

Members of the Al-Mustaqbal University community must act with dignity and commensurate with their membership in a world-class university. They shall perform their duties diligently, honestly, fairly, and transparently, and comply with all applicable laws and regulations. To achieve these goals and vision, the University will:

1. Promote a culture of ethics, integrity, and best practices in the management of its affairs and resources, and require all members of its society to abide by the Code of Ethics and the Code of Service.
2. Promote an Al-Mustaqbal University free of corruption, with zero tolerance for any form of corruption among its members and in all its affairs.
3. Promote the adoption and practice of the following core values:

A. Social justice in the implementation of the university's tasks.
B. Integrity, transparency, and accountability.
C. Passion for excellence and dedication to duty.
D. Educating the university community and stakeholders about the effects of corruption through the organization of workshops and seminars.

Article 5

1. As an element of Al-Mustaqbal University's goal of social responsibility, we are committed to ensuring high standards of ethics and values, and the same high values applied to research and teaching activities explicitly extend to governance and financial transactions.
2. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to corruption, bribery, fraud, or other financial matters.
3. Under this policy, we ensure full access to Iraqi courts or the National Office of the Prosecutor to investigate any suspicious activities.

4. We will comply with all relevant anti-bribery and anti-corruption laws in Iraq. However, we are bound by the laws of Iraq, including:

A. Iraqi Private Higher Education Law No. (25) of 2016.
B. Iraqi Commission of Integrity Law No. (30) of (2019).
C. Iraqi Discipline Law for State Employees (1991).
D. Iraqi Student Discipline Law No. (160) of (2007).

5. We guarantee to our society that corruption and organized crime have no place in our organization and these laws will be applied to everyone and in any circumstances.
6. We guarantee to our community that there is no place for corruption and organized crime in our organization and these laws will be applied to everyone and in any circumstances.
7. Al-Mustaqbal University takes its legal responsibilities seriously and recognizes that if it is proven to have committed any crimes of bribery and corruption it can be punished, and face serious damage to its reputation, including individuals.
8. The policy serves as a source of information and guidance for university employees and helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities.
9. This policy and its associated interpretive guidelines have been adopted by the University Council and applied throughout the University.

This policy should be made publicly available and posted on the University's website at https://uomus.edu.iq/.

A. Ensure best governance practices and oversee the anti-corruption program.
B. Use communication and training to embed an anti-corruption program.
C. This policy may be amended at any time.
D. Ensure accountability to stakeholders through transparency and public reporting.
E. Ensure that HR policies and procedures support the anti-corruption program.
F. Design an anti-corruption program based on risk assessment.
G. Provide safe and accessible advice.
H. Continuously monitor, evaluate, and improve the implementation of the anti-corruption program

Article 6

Who is covered by this policy and must comply with it?

1. This policy applies to all individuals working at all levels, including senior managers, rectors, deans of colleges, heads of departments, directors of divisions and units, as well as all of our employees (whether permanent, fixed-term, temporary, consultants, seconded employees, temporary workers, agency employees, volunteers, interns, and agents) and any of our affiliates or employees, wherever they are (collectively, Employees of this Policy).
2. The University expects our employees at all levels to act with integrity and avoid any acts that may be considered a crime following the Iraqi Penal Code No. 111 of 1969 and the Iraqi Commission of Integrity Law No. (30) of 2019.
3. Adherence to the rules and policies established by the University, including this policy, is a prerequisite for employment. Any alleged violation of this policy will be investigated (and appropriate action taken where appropriate) following the Iraqi Disciplinary Procedures for State Employees of 1991. We reserve the right to terminate the contractual relationship with any worker or organization that violates this policy.

Article 7

Gifts and Hospitality

1. The University understands that giving and receiving gifts or hospitality varies between countries and regions, and what may be acceptable in one region may not be so in another. The criterion of whether a gift or hospitality is reasonable and justified must be applied in all circumstances, taking into account the intention behind its offering.
2. This policy does not prohibit normal and appropriate hospitality (provided and received) to or from third parties, nor does it prevent the establishment or maintenance of good business relations or the improvement or preservation of the University's reputation and image.
3. Gifts may be given or received provided that the following requirements are met:

A. It is not intended to influence a third party to obtain or retain the business or any commercial advantage, to reward the maintenance of the business, or to be in an express or implicit exchange for services or benefits.
B. It must be submitted in the name of the university, not in the name of the individual.
C. Not include cash.
D. Be appropriate in context. For example, giving small gifts on Teacher's Day or World Press Freedom Day is an accepted tradition in Iraq.
E. The gift should take into account the reason for giving it, be of the right type and value, and give it at the right time, publicly, not secretly.

Article 8

What is not acceptable:

1. Engaging in any activity that violates or may violate public morals and Iraqi laws.
2. give or promise to give or offer payment, gift, or hospitality to a government official, agent, or representative, whether to "facilitate" or expedite a routine procedure or otherwise;
3. Accepting payment from a third party that employees know or suspect is being offered to them with the expectation that it will receive an advantage for them.
4. Accept a gift or hospitality from a third party if employees know or suspect that it is being offered or offered with the expectation that an advantage will be provided by us in return.
5. Threatening or retaliating against another employee who refused to commit a crime of bribery and corruption or raised concerns under Iraqi law.

Article 9

Responsibilities:

1. The President of the University Council is responsible for ensuring that this policy is implemented and maintained, and providing the necessary explanatory guidance. The Chancellor's assistants, deans, assistants, and department heads are responsible for educating affected staff, students, and others involved in this policy and associated directives.
2. The prevention, detection, and reporting of bribery and other forms of corruption is the responsibility of all employees of or under the control of the University. All individuals are requested to avoid any activity that may result in a breach of this policy.
3. Employees should notify their line manager, rector's office or assistants, deans and their assistants, or department heads as soon as possible if they believe or suspect a breach of this policy may occur or may occur in the future.
4. It is the responsibility of each faculty member or anyone associated with the University to ensure that they comply with this policy at all times and to protect them from bribery or fraud.
5. Employees must ensure that this policy is read, understood, and complied with.
6. The President of the University Council, or the Dean of the College of Law, is the commissioner responsible for monitoring the effectiveness of this policy, conducting periodic reviews of it, and proposing any necessary amendments to the Council. To achieve these objectives, it will:

A. Ensure that appropriate levels of guidance and training are provided to support this policy and are continuously updated.

B. Ensure that all standard documentation and procedures (including terms and procedures for purchase, fundraising, documentation, and terms and conditions of sale and employment) reflect the requirements of this policy.
C. Ensure that procedures are in place to deal with suspected cases of bribery and fraud, and coordinate the university's response to any investigation or accusation under the Iraqi Integrity Commission Law No. (30) of 2019.
D. Ensure that procedures are in place to communicate this policy to all staff and others who work on behalf of or service the University and, where needed, arrange further mentoring and training.
E. Prepare an annual report on the implementation of this policy, including the results of any risk assessments and due diligence and any related reports.

Article 10

Dealing with Corruption Cases:

Al-Mustaqbal University community members and other stakeholders can report any corruption cases in multiple ways, including:

1. Report in person.
2. Send reports via email.
3. Placing reports in corruption reporting boxes located in the main buildings of the university.
4. Telephone.
5. Use the official website of the university.
6. Reporting directly to the President of the University Council, the Office of the President of the University, his assistants, deans of faculties, or heads of departments.

Corruption Reporting Funds are located at strategic points within the main buildings of the University (51001 Hilla, Babylon, Iraq).

Any report will be sent to the college's investigative committee for further study and work. If the nature of the case and the available evidence warrant it, the case could be referred to the Ethics and Anti-Corruption Commission or other law enforcement agencies. In all cases, fairness will be observed and appropriate action will be taken promptly.

Article 11

Protection of whistleblowers:

The identity of the persons submitting the corruption reports will be fully protected from disclosure and any reprisals or harmful acts concerning the reports.

Article 12

Enforcement Authority

The President of the University Council is responsible for the implementation of this policy.

Article 13

Review:

This policy must be reviewed every two (3) years or earlier as needed

Approval

Document Type: Policy
Title: Anti Corruption Policy

Approval Authority: President of the Council of Al-Mustaqbal University Start Date: July 2023

Signature:_____ History:_____ Certified by:

Prof. Dr. Hassan S. Majdi, President of the Al-Mustaqbal University Council