

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

University of Warith Al-Anbiyaa

Version 1.0 — 2025

Policy Title	Anti-Bribery and Anti-Corruption Policy
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Policy Owner	Office of Legal Affairs & Compliance, University of Warith Al-Anbiyaa
Co-Owner	Human Resources Directorate, University of Warith Al-Anbiyaa
Applies To	All staff (academic and administrative), students, contractors, consultants, agents, and third parties acting on behalf of UOWA

Bribery and corruption are serious criminal offences under Iraqi law and are fundamentally incompatible with the values, integrity, and mission of the University of Warith Al-Anbiyaa. This policy applies to every person associated with UOWA, without exception, and failure to comply may result in criminal prosecution, civil penalties, dismissal, and reputational damage to the University and to individuals concerned.

1. Purpose & Commitment

The University of Warith Al-Anbiyaa (UOWA) is committed to conducting all of its activities with the highest standards of integrity, transparency, and ethical conduct. The University has a zero-tolerance policy toward bribery and corruption in any form, whether occurring within the University, between the University and external parties, or through third parties acting on UOWA's behalf.

This Anti-Bribery and Anti-Corruption Policy sets out the University's commitment to preventing bribery and corruption, defines prohibited conduct, establishes responsibilities, and provides guidance on recognising, avoiding, and reporting concerns. This policy reflects the University's obligations under Iraqi law and its alignment with international anti-corruption standards.

UOWA recognises that corruption undermines the public trust that higher education depends upon, distorts fair competition, diverts resources from their intended purposes, and causes serious harm to students, staff, and the wider community. The University is committed to being a model of integrity in all its dealings — internal and external.

2. Scope

This policy applies to all individuals associated with UOWA, including:

- All academic staff — professors, lecturers, researchers, and teaching assistants
- All administrative and professional staff at every level
- Students, student union representatives, and student society officers
- Members of the University's governing and advisory bodies

- Contractors, consultants, suppliers, and service providers engaged by UOWA
- Agents, representatives, and intermediaries acting on UOWA's behalf
- Visiting scholars, secondees, and volunteers

This policy applies to conduct occurring in Iraq and in any other jurisdiction where UOWA operates, has partnerships, or engages in activities. It applies equally to bribery and corruption attempts that are made, received, offered, or facilitated, regardless of whether the act ultimately succeeds.

3. Definitions

Term	Definition
Bribery	The offering, giving, receiving, or soliciting of any financial or other advantage — whether directly or through a third party — with the intention of improperly influencing a person's actions, decisions, or judgements in a position of trust.
Corruption	The abuse of entrusted power for private gain. This includes bribery but also encompasses fraud, embezzlement, misuse of university resources, nepotism, favouritism, and any other conduct that perverts the proper exercise of institutional authority.
Facilitation Payment	An unofficial, typically small payment made to a public official to secure or expedite a routine service or action to which the payer is legitimately entitled. Facilitation payments are prohibited under this policy, regardless of amount.
Kickback	A payment made to reward a person for improperly directing business, contracts, or decisions in favour of the payer or the payer's associates, often as a percentage of contract value.
Conflict of Interest	A situation in which a person's private interests, financial, personal, or professional, could improperly influence, or appear to influence, their exercise of institutional duties or responsibilities.
Improper Advantage	Any benefit to which the recipient is not legitimately entitled, that is offered, given, or received to influence the exercise of a duty or responsibility.
Public Official	Any person holding a legislative, executive, administrative, or judicial office in Iraq or any other country, including employees of state-owned enterprises and international organisations.
Third Party	Any individual or organisation that interacts with UOWA, acts on its behalf, or engages in transactions with UOWA, including suppliers, contractors, agents, partners, and donors.

4. Prohibited Conduct

The following conduct is strictly prohibited for all persons covered by this policy, at all times and in all circumstances:

4.1 Bribery — Offering or Giving

- Offering, promising, or giving a bribe to any person, whether a public official, private sector employee, or any other individual, to influence their actions or decisions
- Authorising, directing, or facilitating a third party to offer or give a bribe on UOWA's behalf
- Making any payment or providing any benefit to secure an improper business, academic, or regulatory advantage for UOWA or any individual

4.2 Bribery, Receiving or Soliciting

- Requesting, accepting, or agreeing to accept a bribe from any person in connection with one's role or duties at UOWA
- Allowing one's actions or decisions in a UOWA capacity to be influenced, or appearing to be influenced, by the offer or receipt of any improper advantage
- Soliciting or extorting payments or benefits from students, staff, contractors, or any other party in exchange for favourable treatment

4.3 Facilitation Payments

- Making facilitation payments of any kind, to any person, in any jurisdiction, regardless of local custom or practice
- Permitting or concealing facilitation payments made by third parties acting on UOWA's behalf

4.4 Fraud & Misuse of Resources

- Falsifying records, invoices, expense claims, academic documents, or any other University records
- Misappropriating or misusing University funds, assets, or resources for personal benefit or the benefit of associates
- Manipulating financial reporting, procurement processes, or examination results for personal or improper gain
- Using UOWA's name, reputation, or resources to gain personal advantages unrelated to legitimate institutional activities

4.5 Conflicts of Interest

- Participating in a procurement, hiring, examination, grade award, or any other institutional decision where an undisclosed personal interest exists
- Awarding contracts, employment, academic grades, or other benefits to family members or associates without disclosure and without following fair competitive processes
- Accepting gifts, hospitality, or benefits from parties with whom one has an ongoing or prospective business or academic relationship with UOWA, without prior disclosure and approval

5. Gifts, Hospitality & Expenses

5.1 Principles

UOWA recognises that the giving and receiving of reasonable gifts and hospitality can be a normal and legitimate part of building professional and academic relationships. However, gifts and hospitality can also constitute bribery if they are intended to improperly influence conduct or decisions. The following rules apply to all staff and persons acting on behalf of UOWA:

5.2 Permitted Gifts & Hospitality

- Gifts of nominal value given or received in the course of legitimate professional activities, provided they are transparent and not given in expectation of a favour

- Reasonable meals and hospitality provided in the context of legitimate academic, professional, or institutional events, where the primary purpose is relationship-building or information exchange
- Promotional materials of modest value carrying the giver's institutional logo or branding

5.3 Prohibited Gifts & Hospitality

- Cash or cash equivalents (gift cards, vouchers, cryptocurrency) of any value
- Any gift or hospitality offered to or received from a party during an active procurement, tender, or competitive selection process involving UOWA
- Gifts or hospitality that are excessive in value, frequency, or lavishness, even if individually within the threshold
- Gifts or hospitality given or received in circumstances that could reasonably give rise to an appearance of impropriety
- Any gift, payment, or favour provided to a public official in connection with UOWA business

5.4 Declaration & Approval Requirements

All gifts and hospitality received must be declared in the University's Gifts & Hospitality Register within five (5) working days of receipt. The register is maintained by the Office of Legal Affairs & Compliance and is subject to periodic audit.

Any gift offered on behalf of UOWA must receive prior written approval from the relevant Head of Department and the Office of Legal Affairs & Compliance.

6. Conflicts of Interest

6.1 Declaration Obligation

Every person covered by this policy has a personal responsibility to identify and promptly declare any actual, potential, or perceived conflict of interest to their line manager and to the Office of Legal Affairs & Compliance. A conflict of interest exists whenever a person's personal interests could influence, or be perceived to influence, the exercise of their duties to UOWA.

6.2 Situations Requiring Declaration

- Involvement in procurement decisions where the person has a personal, financial, or family relationship with a bidding supplier
- Participation in hiring or performance review processes involving a relative, partner, or close personal associate
- External employment, consultancy, or board membership that may conflict with UOWA duties or use UOWA resources or knowledge
- Personal financial interests in organisations that have or are seeking a relationship with UOWA
- Involvement in research or academic activities where a personal financial interest in the outcome exists
- Receipt of gifts, hospitality, or benefits from parties with whom UOWA has or is seeking a business or academic relationship

6.3 Management of Conflicts

Declared conflicts of interest shall be recorded in the Conflict-of-Interest Register and managed through one of the following approaches, as determined by the line manager and Legal Affairs & Compliance:

- Restricted involvement, the person participates in a limited capacity with appropriate oversight

- Disclosure to relevant parties, other decision-makers are informed of the interest
- Divestment or resignation from the conflicting external role

Failure to declare a known conflict of interest is itself a breach of this policy and may result in disciplinary action.

7. Due Diligence on Third Parties

UOWA is responsible for the conduct of third parties acting on its behalf. Before engaging contractors, agents, consultants, partners, or other third parties, the relevant department shall conduct proportionate anti-bribery and anti-corruption due diligence, including:

- Verifying the identity and legal registration of the third party
- Assessing the third party's reputation, ownership structure, and any known involvement in corruption or bribery
- Reviewing the third party's own anti-bribery and anti-corruption policies and commitments
- Ensuring that contracts with third parties include anti-bribery and anti-corruption clauses and the right of UOWA to audit compliance
- Applying enhanced due diligence for higher-risk third parties, jurisdictions, or sectors

A third party that offers or provides a bribe on UOWA's behalf, or that is discovered to have done so, shall have its engagement terminated immediately. UOWA shall report the matter to the relevant Iraqi authorities as required by law.

8. Political Contributions

- UOWA shall not make any political contributions, financial or in-kind, to any political party, candidate, campaign, or political organisation in Iraq or elsewhere
- University resources, facilities, staff time, or institutional name shall not be used to support or oppose any political party, candidate, or political campaign
- Where legitimate academic or policy engagement involves interaction with government bodies or public officials, this shall be conducted transparently, on the public record, and consistent with UOWA's mission as an academic institution
- Staff engaging in personal political activity in their individual capacity must ensure a clear separation between their personal views and their UOWA role, and must not use UOWA resources for personal political activities

9. Reporting Concerns, Speak Up

9.1 Reporting Channels

UOWA encourages all persons covered by this policy to speak up if they become aware of, or suspect, any bribery or corruption, whether actual, attempted, or planned. The following reporting channels are available:

Channel	Details
Line Manager / Head of Department	For concerns that do not involve the line manager and where the reporter is comfortable approaching their supervisor.

Office of Legal Affairs & Compliance	The primary channel for all anti-bribery and corruption concerns. Confidential. Reports may be submitted in person, by email, or in writing.
University President's Office	For concerns involving senior management or where other channels are inappropriate.
Anonymous Reporting	A confidential anonymous reporting mechanism is available on the UOWA website. Anonymous reports will be investigated to the extent practicable given the information provided.
Iraqi Integrity Commission (HIC)	All persons have the right to report suspected public corruption to the Iraqi Integrity Commission (هيئة النزاهة) independently of internal channels.

9.2 Whistleblower Protection

UOWA is committed to protecting anyone who raises a genuine concern about bribery or corruption in good faith. The University guarantees that:

- No person shall suffer retaliation, victimisation, demotion, dismissal, or any other detriment as a result of making a good-faith report under this policy
- The identity of the reporting person shall be kept strictly confidential to the maximum extent possible given the requirements of investigation
- Any person found to have subjected a whistleblower to retaliation shall be subject to serious disciplinary action, up to and including dismissal
- Protection applies even if the concern is not ultimately substantiated, provided the report was made genuinely and in good faith

UOWA recognises that a person raising a concern may feel anxious or uncertain. The University commits to treating all reporters with respect, keeping them informed of the progress of any investigation to the extent possible, and supporting them throughout the process.

9.3 Malicious or False Reports

Deliberately making a false or malicious report of bribery or corruption against another person is itself a serious disciplinary offence and will be dealt with accordingly. This provision shall not be used to discourage genuine good-faith reporting.

10. Investigation Procedure

All reported concerns of bribery or corruption shall be taken seriously and investigated promptly, impartially, and confidentially. The investigation procedure shall be as follows:

1. Upon receipt of a report, the Office of Legal Affairs & Compliance shall acknowledge receipt within three (3) working days
2. An investigating officer shall be appointed who is independent of the subject(s) of the concern and free from any conflict of interest
3. The investigating officer shall conduct a preliminary assessment within ten (10) working days to determine whether the concern warrants a full investigation
4. Where a full investigation is warranted, it shall be conducted in accordance with natural justice principles — the subject shall be informed of the allegations and given the opportunity to respond

5. The investigation shall aim to conclude within thirty (30) working days; more complex cases may require additional time, with regular updates provided to the University President
6. Investigation findings and recommended actions shall be submitted in a written report to the University President
7. Where the evidence indicates a criminal offence, the matter shall be reported to the relevant Iraqi law enforcement authorities, including the Integrity Commission (HIC), as required by law
8. Both the complainant and the subject shall be informed of the outcome in writing, subject to confidentiality requirements

11. Sanctions

Any person found to have breached this policy — whether by engaging in bribery or corruption, facilitating such conduct, concealing it, or failing to report a known instance — shall be subject to disciplinary action. Sanctions may include:

Severity	Possible Sanctions
Minor breach (e.g., failure to declare a small gift in time)	Formal written warning; mandatory training; entry in the compliance record
Moderate breach (e.g., undisclosed conflict of interest; accepting a prohibited gift)	Final written warning; suspension; mandatory training; possible demotion
Serious breach (e.g., offering or accepting a bribe; kickback; facilitation payment)	Immediate suspension pending investigation; dismissal; referral to Iraqi authorities; civil recovery action
Criminal conduct	Referral to Iraqi law enforcement and Integrity Commission; cooperation with criminal prosecution; civil recovery of losses

Sanctions apply regardless of seniority, length of service, or previous performance record. The University may also pursue civil remedies to recover any losses suffered as a result of corrupt conduct.

12. Training & Awareness

UOWA is committed to ensuring that all persons covered by this policy understand its requirements and are equipped to apply it in practice. To this end:

- All new staff and students shall receive anti-bribery and anti-corruption training as part of their induction programme
- All staff with procurement, financial, or external relationship responsibilities shall undertake dedicated anti-bribery training at least every two years
- Refresher training shall be provided following any significant update to Iraqi anti-corruption law or this policy
- Training records shall be maintained by the Human Resources and monitored for completion
- Senior management and members of the Investment & Sustainability Committee shall receive enhanced training addressing their particular responsibilities
- Awareness materials in Arabic and English shall be displayed prominently in university offices and on the UOWA website

13. Record-Keeping & Monitoring

The following records shall be maintained by the Office of Legal Affairs & Compliance and subject to annual audit:

- Gifts & Hospitality Register — all declarations of gifts and hospitality given or received
- Conflict of Interest Register — all declared conflicts and their management outcomes
- Derogation Register — approved exceptions to this policy
- Concerns & Investigations Log — summary records of all reports received and their outcomes
- Training Completion Records — evidence of anti-bribery training for all covered persons

An annual Anti-Bribery and Anti-Corruption Compliance Report shall be submitted to the University President summarising the University's performance, incidents reported, and any systemic issues identified. This report shall be shared with the Founding Body (Hussenia Holy Shrine) and, where relevant, published in summary form on the UOWA website.

14. Responsibilities

Role	Responsibility
University President	Ultimate accountability for this policy; approves the policy and material amendments; receives annual compliance reports; escalates criminal matters to law enforcement.
Office of Legal Affairs & Compliance	Day-to-day policy oversight; maintains all registers; receives and investigates reports; provides legal guidance; delivers training; reports annually to the President.
Human Resources	Administers disciplinary proceedings; maintains training records; ensures policy awareness during induction; supports the investigation process.
Finance	Ensures financial controls prevent and detect corrupt conduct; reviews expense claims and procurement records; reports suspicious transactions.
All Heads of Colleges & Departments	Ensure staff awareness and compliance within their units; promptly escalate concerns; manage declared conflicts of interest; model ethical leadership.
All Staff, Students & Third Parties	Comply with this policy at all times; declare gifts, hospitality, and conflicts of interest promptly; report concerns in good faith; cooperate with investigations.

15. Policy Review

This policy shall be reviewed every two (2) years by the Office of Legal Affairs & Compliance in collaboration with the Human Resources, or earlier if required by changes in Iraqi anti-corruption law, international standards, or lessons learned from reported incidents. All amendments require approval by the University President.