



# Anti-Bribery and Corruption Policy

Doc No: TIU.RC.IN. E

Version: 01

Issue date:

## References

### National / Regional:

1. Iraqi Penal Code (Law No. 111, 1969, amended), including anti-corruption provisions
2. Kurdistan Region Anti-Corruption Law (Law No. 2, 2010)
3. Iraq Anti-Money Laundering and Counter-Terrorism Financing Law (Law No. 39, 2015)

### Global / International Conventions and Standards:

1. United Nations Convention Against Corruption (UNCAC), 2003
2. OECD Anti-Bribery Convention, 1997
3. ISO 37001:2016 – Anti-Bribery Management Systems
4. UN Global Compact Principles (Integrity, Anti-Corruption, Transparency)

## 1. Policy Purpose

The purpose of this policy is to prevent, detect, and address bribery and corruption in all activities conducted by TIU, its staff, students, contractors, suppliers, and partners.

TIU, as a private university serving the community and the country, is committed to ethical governance, integrity, transparency, and accountability in all operations, including academic, administrative, procurement, research, and partnership activities.

## 2. Scope

This policy applies to:

- All faculty, staff, management, and governing bodies of TIU
- All students and researchers involved in university programs or projects
- All suppliers, contractors, consultants, and partners engaged by TIU
- All financial and non-financial transactions, including donations, grants, sponsorships, procurement, and international collaborations



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### 3. Policy Principles

TIU shall:

- TIU strictly prohibits offering, giving, soliciting, or accepting bribes or improper advantages in any form.
- All staff and students must avoid conflicts of interest and report any suspicion of corruption.
- Maintain transparent financial and administrative records, including procurement, grants, and partnerships.
- Ensure auditable processes for all financial and operational decisions.
- Adhere to national anti-corruption laws and international conventions (UNCAC, OECD).
- Ensure all contracts, agreements, and collaborations include anti-bribery clauses.
- Uphold academic integrity, avoiding bribery or undue influence in admissions, grading, research funding, or publications.
- Encourage faculty and students to report unethical behavior without fear of retaliation.
- Conduct due diligence on suppliers, contractors, and partners to assess bribery or corruption risks.
- Include risk assessment criteria in procurement, investment, and research collaborations.
- Provide regular training for staff, faculty, and students on anti-bribery, corruption risks, and compliance measures.
- Disseminate guidelines, codes of conduct, and reporting procedures to all stakeholders.
- Establish confidential channels for reporting bribery, corruption, or unethical behavior.
- Protect whistleblowers from retaliation.
- Investigate reported cases promptly and take corrective actions as needed.
- Periodically review and update anti-bribery measures.
- Conduct internal audits and risk assessments to ensure compliance and effectiveness.
- Align with ISO 37001 anti-bribery management standards and international best practices.



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## 4. Roles & Responsibilities

- **University Board and President:** Approve the policy, provide oversight, and ensure resources for implementation.
- **TIU Legal and Compliance Office:** Monitor compliance, conduct risk assessments, and provide guidance on anti-corruption matters.
- **Faculty and Administrative Staff:** Adhere to the policy, report potential violations, and promote ethical practices.
- **Students:** Follow ethical guidelines, avoid bribery or corrupt practices, and report misconduct.
- **Suppliers, Contractors, and Partners:** Comply with TIU's anti-bribery standards and contractual requirements.

## 5. Enforcement and Consequences

- Violation of this policy may result in:
  - Disciplinary action (for staff and students), up to termination or expulsion
  - Legal action in accordance with Iraq/Kurdistan anti-corruption laws
  - Termination of contracts or partnerships with suppliers or collaborators
- TIU will cooperate fully with national and international authorities in investigating bribery or corruption cases.

**Asst. Prof. Dr. Mehmet Ozdemir**

**Vice President, Tishk International University (TIU)**

**Date:** 18/05/2024