

# University of Management and Technology

## Anti-Bribery & Corruption Policy (Draft Version)

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# Anti-Bribery & Corruption Policy

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## Anti-Bribery & Corruption Policy

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### 1 Purpose

The purpose of this policy is to establish a clear framework to prevent, detect, and respond to bribery and corruption within the University of Management and Technology (UMT).

UMT is committed to conducting its academic, administrative, research, and commercial activities with the highest standards of integrity, transparency, and ethical conduct.

This policy ensures compliance with applicable laws and promotes a culture of accountability and responsible governance.

### 2 Scope

This policy applies to all employees, Consultants and advisors, third-party vendors, participants and all affiliated entities, and official university activities.

### 3 Definitions

- a. Bribery: Offering, promising, giving, requesting, or accepting anything of value to improperly influence a decision or action.
- b. Corruption: Any abuse of entrusted power for private gain.
- c. Whistleblower: An individual who, in good faith, reports suspected bribery, corruption, or other misconduct under this policy.

### 4 Policy:

- a. UMT maintains a zero-tolerance approach to bribery and corruption. Employees and representatives of UMT must not directly or indirectly offer, promise, give, solicit, or accept any form of bribe or improper advantage.
- b. All decisions must be based on merit, transparency, fairness, and compliance with university policies.

#### 4.1 Prohibited Practices

The following practices are strictly prohibited:

- a. Offering or accepting bribes
- b. Embezzlement and Procurement Fraud
- c. Misappropriation of operational funds, or other university assets
- d. Manipulating research materials or processes
- e. Academic Fraud and Cheating Plagiarism
- f. Manipulation of bidding processes for infrastructure or procurement projects
- g. Recruitment and Promotion Misconduct
- h. Kickbacks in procurement or contracts
- i. Undisclosed conflicts of interest
- j. Improper gifts or hospitality intended to influence decisions
- k. Facilitation payments to bypass procedures

#### 4.2 Gifts Provision

- a. Employees must exercise caution when accepting or offering gifts or hospitality.
- b. Modest tokens of appreciation, Academic souvenirs, Standard institutional hospitality are acceptable.

- c. Where appropriate, gifts exceeding acceptable limits must be declared to OHCM or the relevant authority.
- d. Cash or cash equivalents / Gifts intended to influence decisions, and high-value personal gifts are extremely unacceptable and will be deemed as violation of the Code of Conduct and trigger a formal Disciplinary Action proceeding.

## **5 Conflict of Interest**

- a. Employees must disclose any potential conflict of interest, including:
  - i. financial interests in vendor organizations,
  - ii. family relationships in recruitment decisions,
  - iii. personal relationships influencing academic or administrative decisions.
- b. All conflicts must be declared and managed transparently.

## **6 Procurement and Vendor Relations**

- a. Employees must not accept benefits from vendors or suppliers that may influence institutional decisions.
- b. All procurement and vendor engagements must follow transparent procurement procedures, competitive bidding where applicable and all laid down SOPs.
- c. All contracts with third-party vendors, contractors, must include an explicit anti-bribery and corruption clause requiring compliance with this policy.
- d. UMT reserves the right to terminate any contract where a breach of such clause is established.
- e. Prior to engaging any new third party, a proportionate, risk-based due diligence assessment must be conducted to verify the third party's identity, ownership, integrity.

## **7 Risk Assessment**

- a. IAD shall conduct bribery and corruption risk assessment across UMT's operations and functions.
- b. All DDSI & UMO Head must assess the corruption vulnerability of their activities on an ongoing basis, with particular attention to procurement, admissions, research, and partnerships with external entities.
- c. The risk assessment shall be reviewed at least annually, or following any significant organizational change, and findings shall be reported to senior management.

## **8 Reporting:**

- a. All employees and stakeholders are encouraged to report suspected bribery or corruption to the concerned officials.
- b. Reports may be submitted confidentially and will be investigated promptly and appropriately.
- c. Reports should be submitted directly to a line manager or HOD, OHCM, Internal Audit or anonymously through a dedicated reporting mechanism established by UMT.
- d. Anonymous reports will be taken seriously and investigated to the extent reasonably practicable.

- e. Employees who encounter a demand or request for a bribe, whether from an internal or external party, must refuse and report the incident promptly.
- f. Where personal safety is at risk, the employee's safety takes precedence, however, the incident must be reported at the earliest safe opportunity.
- g. Where a complaint is found to have been made deliberately and in bad faith, this shall be treated as misconduct and dealt with under the applicable disciplinary procedure.

## **9 Books, Records, and Financial Controls**

- a. All financial transactions must be properly authorized in accordance with UMT's internal approval procedures.
- b. No payments shall be made through unofficial or unverified channels.
- c. Adequate internal accounting controls shall be maintained and reviewed periodically by OTR and Internal Audit.
- d. IAD to detect patterns indicative of corrupt practices, including unusual routing of payments, fictitious invoices, or inflated expense claims.

## **10 Political and Charitable Donations**

- a. UMT does not make donations to political parties, political candidates, or political campaigns.
- b. Any such donation, whether direct or indirect, is strictly prohibited.
- c. Charitable donations and sponsorships made on behalf of UMT must be approved in advance by the relevant authority.
- d. Charitable donations must be legal under applicable laws, and cannot be made in exchange for any business advantage.

## **11 Protection for Whistleblowers**

- a. UMT strictly prohibits retaliation against individuals who report concerns in good faith. All reports will be handled with discretion and confidentiality.
- b. Any act of retaliation, intimidation, or victimization against a whistleblower shall itself be treated as a serious disciplinary offence and investigated accordingly.

## **12 Roles & Responsibilities:**

### **12.1 Dean, Director and UMO Heads:**

- a. Promote an ethical culture and ensure compliance with this policy within their respective departments.

### **12.2 Office of Human Capital Management (OHCM)**

- a. Maintain and disseminate policy awareness across the university.
- b. Provide guidance and training on ethical conduct and this policy to all staff.
- c. Maintain a confidential register of all reported incidents and their outcomes.

### **12.3 Internal Audit**

- a. Conduct periodic reviews of financial and operational controls to detect and deter corrupt practices.

- b. Investigate any reported employee-related violations in a fair, impartial, and timely manner.
- c. Report audit findings and irregularities to senior management and the relevant oversight body.
- d. Recommend corrective actions and monitor their implementation

**13 Compliance & Enforcement:**

Employees must comply with this policy, report suspected violations promptly and avoid conflicts of interest. Non-compliance may itself constitute a disciplinary offence.

**14 Violations and Disciplinary Action:**

Violation of this policy may result in disciplinary action, termination of employment, cancellation of vendor contracts, and/or legal action where applicable. The severity of consequences shall be proportionate to the nature and gravity of the violation.

**Approval Stamp**