



Bahria University

27- Do you have an Anti-bribery and corruption policy?

Yes, Bahria University has an established Anti-Bribery and Corruption Policy. This policy outlines the University's commitment to maintaining integrity, transparency, and accountability across all its academic, administrative, and operational activities.

Evidence is attached below.

BAHRIA UNIVERSITY

Discovering Knowledge



BU Anti-Bribery and Corruption Policy (2026)

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Bahria University

Anti-Bribery and Corruption Policy

1. Introduction

1.1 Bahria University is committed to maintaining the highest standards of integrity, transparency, accountability and ethical conduct in all academic, administrative, financial, research and operational activities. The University recognizes that bribery and corruption undermine institutional credibility, damage public trust, distort decision making and result in misuse of institutional resources. Accordingly, Bahria University adopts a strict zero-tolerance approach towards bribery, corruption, fraud, unethical inducements, abuse of authority and all forms of financial or administrative misconduct.

1.2 This BU Anti-Bribery and Corruption Policy establishes a comprehensive framework for the prevention, detection, reporting, investigation and response to bribery and corruption in all University operations and activities. The policy applies to all employees, faculty members, officers, staff, students, contractors, consultants, vendors, partners and any individuals or organizations acting on behalf of Bahria University, across all campuses, constituent units and affiliated institutions.

2. Purpose

2.1 The purpose of this policy is to protect the integrity, academic mission, assets and reputation of Bahria University by ensuring that all university affairs are conducted with honesty, transparency and accountability. This policy establishes clear standards for ethical conduct in all key areas of university operations, including teaching, research, admissions, procurement, financial management, recruitment and hiring, examinations, approvals and external engagements with partners and stakeholders. It also provides a structured and practical framework for the prevention of bribery and corruption, as well as clear procedures for reporting suspected misconduct, conducting investigations and taking appropriate disciplinary and corrective actions where violations are identified.

3. Legal and Ethical Basis

3.1 This policy is grounded in the legal and ethical framework governing anti-corruption and integrity in Pakistan. It is in conformity with the national anti-corruption legal framework, including the Prevention of Corruption Act 1947, the National Accountability Ordinance 1999, the Anti-Money Laundering Act 2010 and relevant provisions of the Pakistan Penal Code that address bribery, corruption, fraud and abuse of authority. In all cases, where applicable local laws, regulatory requirements or binding University statutes prescribe

stricter standards or more stringent requirements than those set out in this policy, the stricter standard shall prevail and must be followed.

4. Scope

4.1 This policy encompasses all University related business, operations and activities, regardless of where or how they are conducted, including on-campus, online, off-campus engagements and activities undertaken at the national or international level.

5. Definitions

5.1 Terms used in this policy shall have following meanings:

- a. Bribery. Offering, giving, requesting, receiving or agreeing to receive any undue advantage, whether directly or indirectly, to influence a decision or secure an improper benefit.
- b. Corruption. Abuse of entrusted power for private gain, including bribery, favoritism, kickbacks, fraud, embezzlement, extortion or concealment of misconduct.
- c. Facilitation payment. A small unofficial payment or advantage given to secure or expedite routine action. Such payments are prohibited under this policy.
- d. Third party. Any person or organization that acts for, with, or on behalf of the University, including suppliers, consultants, agents, recruiters and affiliates.
- e. Conflict of interest. A situation where personal, financial, familial or other interests may improperly influence, or appear to influence, an individual's University duties.
- f. Undue Advantage. Any gift, money, service, favor, loan, employment opportunity, discount, travel, entertainment or other benefit that is not legitimately due.

6. Policy Statement

6.1 Bahria University strictly prohibits bribery and corruption in all forms, whether direct or indirect, actual, attempted, or perceived. No person acting for or on behalf of the University shall offer, promise, authorize, request, solicit, accept or receive any undue advantage, financial or non-financial, in order to influence any decision, action or official process. No officer, employee, faculty member or representative of the University may use their position, authority or access to information, to obtain an improper benefit for themselves, their relatives, friends, business associates or any third party. All University transactions and decisions must be conducted with transparency and integrity, and must be

properly authorized, accurately recorded, fully supported by documentation and subject to audit, monitoring and review in accordance with University rules and applicable laws.

7. Prohibited Conduct

Following acts shall be deemed strictly prohibited under the ambit of this policy:

- a. Offering or receiving cash, gift cards, personal loans, commissions, kickbacks, rebates, or other secret inducements. These actions are considered serious misconduct and are subject to immediate disciplinary action.
- b. Offering or accepting gifts or hospitality intended to influence a decision or create an obligation.
- c. Manipulating admissions, examinations, grades, promotions, placements, scholarships, procurement, contracts, recruitment, or disciplinary matters.
- d. Using third parties to conceal or pass on bribes or improper benefits.
- e. Creating false, misleading or incomplete records to conceal improper payments or transactions.
- f. Retaliating against a person who reports a concern in good faith.
- g. The unauthorized sharing or sale of sensitive institutional data or intellectual property for personal gain.

8. Gifts, Hospitality, Travel and Entertainment

Following rules shall apply:

- a. Modest, lawful and infrequent gifts of nominal value may be acceptable only where they cannot reasonably be seen as influencing a decision and where they are properly recorded, approved and consistent with University rules.
- b. Cash or cash equivalents are never acceptable.
- c. Hospitality, travel, accommodation, meals, or entertainment offered by or to third parties must be limited, transparent, lawful and pre-approved, where required. All business-related expenses must be covered by the University to maintain institutional independence and avoid any perception of conflict of interest.
- d. Where a gift or hospitality item cannot be politely refused in the moment, it must be declared immediately to the relevant supervisor/ compliance focal person and recorded for review. All such items must be deposited in the University Gift

Keeping Section (Tosha Khana) and shall be dealt with in accordance with existing Government rules regarding evaluation, retention, or disposal.

9. Conflicts of Interest

9.1 All covered persons must disclose actual, potential or perceived conflicts of interest promptly and completely.

9.2 Individuals must recuse themselves from any decision-making process where a conflict exists or may reasonably be perceived.

9.3 The University may require periodic conflict declarations from designated staff, members of procurement committees, exam committees, admission teams, finance personnel and decision-makers.

10. Donations, Sponsorships and External Funding

10.1 All donations, sponsorships, grants and philanthropic contributions must be accepted only through approved channels and subject to due diligence.

10.2 No donation or sponsorship may be used to secure admissions, academic favors, procurement advantages, naming rights, preferential treatment or regulatory influence.

10.3 Restricted or conditional funding shall be reviewed to ensure that it does not compromise academic independence, fairness, integrity or legal compliance.

11. Procurement, Contracting and Financial Controls

11.1 Procurement must follow approved procedures, competitive principles, documented evaluation criteria, segregation of duties and proper approvals.

11.2 Any attempt to influence a tender, evaluation, award, invoice, payment or variation order through undue advantage is prohibited.

11.3 All payments must be supported by valid documentation, actual receipt of goods or services, and the appropriate financial approvals.

11.4 High-risk transactions should be subject to enhanced review, including vendor due diligence, beneficial ownership checks where practicable, and conflict screening.

12. Reporting and Whistleblowing

12.1 Following rules shall apply:

- a. Any person who becomes aware of suspected bribery, corruption, fraud or related misconduct must report it promptly through the reporting channels designated by the University.
- b. Reports may be made confidentially or anonymously where permitted by the University's reporting arrangements.
- c. Good-faith reporters are protected against retaliation, intimidation, discrimination or adverse action.
- d. Knowingly false or malicious allegations may themselves constitute misconduct and may be dealt with under applicable rules.

12.2 Reporting information is to be minimized i.e who, what, when, where, how, witnesses, documents and any immediate risk to people or University assets.

13. Investigation and Case Handling

13.1 Following rules shall apply:

- a. All allegations shall be screened promptly to determine urgency, credibility, conflict issues, legal exposure and whether interim protective measures are needed.
- b. Investigations shall be handled by authorized personnel only, with confidentiality maintained to the maximum extent possible consistent with fairness and due process.
- c. Evidence must be preserved, access restricted where necessary, and legal or disciplinary steps coordinated through authorized channels.
- d. Where required, the University may refer matters to law-enforcement, accountability, regulatory, or other competent authorities.

14. Disciplinary and Corrective Action

14.1 Subject to findings/recommendations of the inquiry/investigating committee(s) constituted in accordance with BU policies in vogue, violations may result in counseling, warning, training, removal from duties, suspension, recovery action, contract termination, dismissal, debarment, or other lawful measures.

14.2 The University may also resort to corrective actions such as enhanced controls, process redesign, restitution, vendor review, or management intervention.

14.3 Disciplinary action shall be proportionate to the seriousness of the misconduct and consistent with applicable statutes, bylaws, service rules and due process.

15. Training, Communication and Due Diligence

15.1 The University shall provide periodic awareness and role-based training to employees and relevant third parties.

15.2 Employees in higher-risk functions such as procurement, finance, admissions, examinations, projects, research administration and contracts should receive enhanced guidance.

15.3 Appropriate anti-bribery and integrity clauses should be included in contracts, tenders and partnership arrangements where relevant. These clauses must be read to and signed or initiated by the relevant person(s) or authorized representatives to confirm their understanding and commitment to compliance.

15.4 Third parties may be subject to screening, certifications and integrity undertakings proportional to risk.

16. Recordkeeping and Monitoring

16.1 Accurate books, records, approvals and supporting documents must be maintained in accordance with University retention requirements and applicable laws.

16.2 No off-book accounts, secret funds, undisclosed side agreements, or false descriptions of transactions are permitted.

16.3 The University will monitor compliance through audits, inspections, reviews, risk assessments and management reporting.

17. Roles and Responsibilities

17.1 Following roles and responsibilities are entrusted to higher management and all individuals under this policy:

- a. Rector. Approve the policy, promote a tone of zero tolerance and ensure institutional oversight.
- b. Heads of Campuses/DGs. Ensure implementation, allocate resources and hold managers accountable. Promote awareness, identify risks, enforce controls and respond to concerns promptly.
- c. Compliance/designated Focal Person. Maintain reporting channels, coordinate reviews, support investigations and track corrective action.
- d. All Employees and Students. Comply with the policy, complete training, avoid prohibited conduct and report concerns in good faith.

18. Exceptions

18.1 No exception may be granted for bribery, kickbacks, facilitation payments, or any conduct prohibited by law.

18.2 Any limited exception to a procedural requirement under this policy must be documented, justified, approved by the competent authority and consistent with applicable law and University rules.

19. Review and Amendment

19.1 This policy shall be reviewed at least once every three years, or sooner where there is a change in law, regulatory guidance, University structure, or operational risk.


19.2 Any amendment shall follow the University's approval process.

QUICK REFERENCE: NON-NEGOTIABLE RULES

| Do not | Do | Escalate |
|--|--|--|
| Offer or accept cash, kickbacks, or favors. | Use approved channels, approvals, and records. | Any suspicion, attempt, or request. |
| Bypass procurement, admissions, exams, or hiring controls. | Declare conflicts and recuse yourself. | Any pressure to manipulate a decision. |
| Retaliate against a good-faith reporter. | Preserve confidentiality and evidence. | Any urgent risk, fraud, or legal exposure. |

End of Policy Document

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