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4. دَسْرَتِ عَرَبِیِّ رِوَا دَوْعُو

(١) بِرَّ مَوَدِّهِ، بِرَّ مَوَدِّعٍ مَوَدِّعٌ بِرَّ مَوَدِّعٍ

(ر) مَرَسْمُ دَوْدُو مُتَرَسِّمٌ سَرَادُ مَحْمُودِ رَحْمَتِ

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● تجریداً در شرح

(Code of Conduct) اَدَبُ السُّلْطَانِ وَرَسُوْلِهِ

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POLICY ON ANTI-CORRUPTION AND ANTI-BRIBERY

Policy Number:	MNU/UC/2026/5
Version:	1.0
Approved on:	28th September 2026
Effective from:	28th September 2026
Approved by:	University Council

1. Introduction and Purpose

As a state-funded premier institution, The Maldives National University (MNU) is committed to the highest standards of integrity, transparency, and accountability. This policy serves to protect the University's reputation and resources by maintaining a **zero-tolerance approach** toward corruption, bribery, and financial malpractice.

The primary objectives are:

- To ensure full compliance with the Prevention and Prohibition of Corruption Act (2/2000), Maldives Penal Code (9/2014) and other applicable laws and regulations of the Maldives.
- To safeguard public funds in accordance with the Public Finance Act (3/2006) and Regulation R-158/2023
- To establish clear behavioral boundaries for all staff, council members, and affiliates regarding gifts, hospitality, and official conduct
- To promote a culture of ethical conduct, accountability, early reporting, and prevention of corruption across the University

2. Scope

This policy is mandatory and applies to all University Council members, executive leadership, academic and administrative staff, contractors, consultants, and any third party acting on behalf of MNU.

This policy also applies, where relevant, to students, vendors, partners, donors, research collaborators, and any person or entity engaging with MNU in relation to University activities, funds, services, facilities, procurement, recruitment, admissions, assessment, research, or partnerships.

The policy applies to conduct occurring on University premises, during University related activities, during travel or official representation, through digital platforms, and in any situation where the conduct may affect MNU's integrity, operations, reputation, or public trust.

3. Key Definitions and Guidelines

- a) **Corruption:** The abuse of entrusted power for private gain. This includes, but is not limited to, bribery, embezzlement, nepotism, and the misuse of official authority.
- b) **Bribery:** The offering, giving, receiving, or soliciting of any item of value (financial or otherwise) to influence the actions of an official or other person in charge of a public or legal duty.
- c) **Kickback:** A form of negotiated bribery in which a portion of a contract sum is illegally "paid back" to a University employee or official as a quid pro quo for awarding the contract.
- d) **Conflict of Interest (COI):** A situation in which an individual's personal interests (financial, family, or social) could compromise, or appear to compromise, their professional judgment or objectivity in the University matters.
- e) **Fraud:** Any intentional act, misrepresentation, concealment, falsification, or abuse of position designed to obtain an unauthorised benefit or cause loss to MNU, the Government, students, staff, donors, partners, or the public.
- f) **Facilitation Payment:** Any unofficial payment or benefit given to expedite, secure, or influence a routine process or official action.
- g) **Related Party:** A family member, close associate, business partner, company, organisation, or any person or entity with whom an individual has a personal, financial, professional, or other significant relationship.
- h) **Nominal Value:** A small, insignificant financial value (as defined periodically by the Council) for items such as pens, calendars, or modest commemorative plaques.

4. Prohibited Conduct

MNU strictly prohibits the following acts, which constitute a material breach of employment and a criminal offense under Maldivian Law:

- a) **Bribery and Facilitation Payments**
 - 1. **Active Bribery:** Offering or providing any benefit to a third party to gain an unfair advantage in procurement, accreditation, or government relations.
 - 2. **Passive Bribery:** Requesting or accepting any "commission," gift, or favor in exchange for performing (or omitting) a professional duty.
 - 3. **Facilitation Payment:** Making or accepting unofficial payments or benefits to speed up or influence routine administrative, licensing, customs, immigration, procurement, academic, or official processes is strictly prohibited.
- b) **Misuse of Official Position**
 - 1. Using University assets (vehicles, equipment, funds) for personal use or for the benefit of family and associates.

2. Exerting undue influence in the recruitment of staff or the admission/grading of students based on personal relationships rather than merit.
 3. Using official authority to obtain private advantage, preferential treatment, political benefit, personal benefit, or benefit for a related party is prohibited.
- c) **Fiscal Irregularity and Fraud**
4. Falsifying University records, expense claims, or research grant documentation.
 5. Colluding with vendors to bypass the competitive bidding process.
 6. Misappropriating, diverting, or misusing University funds, donor funds, project funds, research funds, student fees, or public resources is strictly prohibited.
 7. Submitting false claims, duplicate claims, inflated claims, unsupported claims, or claims for expenses not incurred is prohibited.

5. Conflict of Interest (COI) Protocols

- a) **Mandatory Disclosure:** All staff involved in financial or recruitment decision-making must submit an annual Declaration of Interest form.
- b) **Transaction-Specific Disclosure:** Employees must declare a COI immediately if they are assigned to a committee or project involving a vendor or candidate with whom they have a personal or financial link.
- c) **Recusal:** Any individual with a declared COI must recuse themselves from the relevant deliberations and voting processes.
- d) The declaration and recusal shall be recorded in the relevant minutes or official records.
- e) Failure to disclose a conflict of interest may itself constitute misconduct, even if no improper benefit is ultimately proven.
- f) Where there is uncertainty about whether a conflict exists, the matter shall be declared and referred to the Ethics and Compliance Committee or the relevant approving authority for guidance.

6. Gifts, Hospitality, and Entertainment Official Sanction:

- a) **General Prohibition:** Staff must not accept gifts, entertainment, or "study tours" from current or prospective vendors that could be perceived as a bribe.
- b) **The Gift Register:** Any gift received in an official capacity (e.g., at an international conference) that exceeds the nominal value must be surrendered to the University or recorded in the Official Gift Register maintained by the Secretariat.
- c) **Hospitality:** Modest business hospitality (e.g., a working lunch) is permitted only if it is transparent, reasonable, and serves a clear University purpose.
- d) Cash, cash equivalents, vouchers, personal discounts, loans, per diems from vendors, personal travel benefits, and gifts intended to influence University decisions are strictly prohibited.

- e) Staff shall not request gifts, hospitality, sponsorship, donations, travel support, or personal benefits from vendors, students, parents, applicants, partners, or parties seeking a decision from MNU.

7. Public Finance and Procurement Compliance

All procurement must adhere to the **Public Finance Regulation (2023/R-158)**:

- a) **Competitive Bidding:** This remains the default method for all procurement to ensure "Value for Money."
- b) **Documentation:** Every stage of the procurement process must be documented and filed for potential audit by the Auditor General's Office.
- c) **Financial Controller Oversight:** Any emergency or "sole source" procurement must receive documented approval from the Financial Controller.
- d) Procurement requirements must not be split, manipulated, delayed, restricted, or designed to avoid thresholds, competition, approvals, or oversight.
- e) Specifications, evaluation criteria, and contract terms must be fair, objective, transparent, and not written to unfairly favour a particular vendor or related party.
- f) All procurement committee members, technical evaluators, and approving officers must sign conflict of interest declarations for each procurement where required.

8. Committee: Ethics and Compliance Committee (ECC)

To oversee the implementation of this policy and ensure institutional integrity, the ECC is established with the following composition:

- a) **Chairperson (DCEO):** Deputy Vice Chancellor (Administration and Finance).
- b) **Core Membership:** The Financial Controller, Head of Internal Audit, Head of Human Resources, Head of Finance, Legal Counsel, and a senior representative nominated by the Vice Chancellor where required.
- c) **Portfolio Representation:** The DVC (Academic) or DVC (Research) shall be co-opted to the committee for cases specifically involving their respective portfolios (e.g., research grant fraud or academic accreditation issues).
- d) **Executive Reporting:** The ECC reports its findings directly to the Vice Chancellor.
- e) **Mandate:** Reviewing high-risk procurement cases, investigating Conflict of Interest (COI) breaches, and recommending formal referrals to the Anti-Corruption Commission (ACC).
- f) **Secretariat:** A Senior Officer from Internal Audit/Secretariat
- g) Members of the ECC shall declare conflicts of interest in relation to any matter before the Committee and shall recuse themselves where impartiality may reasonably be questioned.
- h) The ECC shall maintain confidential records of complaints, investigations, decisions, recommendations, referrals, and follow up actions.

9. Reporting, Whistleblowing, and Investigation

- a) **Duty to Report:** Employees are legally obligated to report suspected corruption. Silence in the face of known malpractice may be treated as complicity.
- b) **Reporting Channels:** Reports may be submitted to Internal Audit, the ECC, the Vice Chancellor, the relevant supervisor, HR, Legal Counsel, or through any approved whistleblowing mechanism established by MNU Whistleblower Protection: In accordance with the Whistleblower Protection Act (16/2019), MNU guarantees that no person will be penalised, demoted, or terminated for reporting corruption in good faith. Knowingly making a false, malicious, or vexatious allegation, or deliberately providing false information, may constitute misconduct and may result in disciplinary action.
- c) **Investigation:** Allegations shall be assessed promptly, confidentially, impartially, and in accordance with procedural fairness.
- d) Persons accused of misconduct shall be given reasonable opportunity to respond to allegations before disciplinary action is finalised, except where immediate interim action is necessary to protect evidence, public funds, safety, or institutional integrity.
- e) Interim measures may include temporary removal from a committee, suspension of delegated authority, reassignment of duties, restricted access to systems, or administrative leave, in accordance with applicable employment rules.
- f) **Sanctions:** Confirmed violations may lead to disciplinary action, including written warning, suspension, demotion, recovery of losses, termination, summary dismissal where legally justified, cancellation of contracts, exclusion from procurement, and referral to Anti-Corruption Commission (ACC) and the Maldives Police Service.

10. Record Keeping, Monitoring and Training

MNU shall maintain accurate and secure records of declarations of interest, gift register entries, procurement decisions, investigation records, disciplinary outcomes, and referrals.

Internal Audit shall periodically review compliance with this policy and report significant risks or breaches to the Vice Chancellor, ECC, and where appropriate, the University Council.

MNU shall conduct regular awareness and training programmes on anti-corruption, anti-bribery, conflict of interest, procurement integrity, whistleblowing, and ethical conduct for staff and relevant committee members.

This policy shall be reviewed at least once every three years, or earlier where required due to changes in law, regulation, audit findings, or institutional risk

11. Related Policies

This policy is a core component of MNU's integrity framework and is related to:

- Whistleblower Policy
- Procurement and Vendor Management Policy

- MNU Code of Conduct
- Expatriate Staff Welfare Policy (Ref)