Integrity and Anti-Organized Crime, Corruption and Bribery Policy

Item	Details
Proposed Document Code	IMC-THE-POL-09
Version	1.1
Policy Owner	Senior Management, in coordination with the Administrative and Financial Affairs Section
Approving Authority	College Board of Directors
Issue Date	December 2025 15
Review Cycle	Every three years or as needed, including when relevant legislation or regulations are amended or introduced
Indicator	THE 16.2.5

Revision History

Date and Status	Revision	Rationale
December 2024 16 Version 1.0	First version of the Integrity and Anti-Organized Crime, Corruption .and Bribery Policy	Documented the institutional commitment to all three areas of the indicator. Approval is verified against the document register and the .publication date against separate evidence
December 2025 15 Version 1.1	Clarified controls for gifts, conflicts of interest, due diligence and reporting. Proposed description for .comparison with the archived version	Explained how to prevent undue influence in decisions, safeguard funds and assets, and .encourage early reporting
	Updated references, specified the reporting and oversight route and documented public and internal .publication	Made all three commitments publicly available and documented their publication date for the indicator, and standardised approval and .review

Purpose and Scope .1

Imam Malik College for Sharia and Law is committed to preventing organized crime, corruption and bribery in its activities and relationships, protecting funds and assets, and reporting and addressing violations. This policy applies to board and committee members, employees, faculty and students, as well .as contractors, partners and agents in their dealings with or representation of the College

,The policy covers governance, admissions, scholarships, assessment, recruitment, research procurement, contracts, donations and partnerships, and other financial, academic and administrative .decisions and transactions

Principles and Commitments .2

The College prohibits offering, promising, giving, soliciting or accepting a bribe directly or through an intermediary, whether in cash or as a gift, service or benefit. The prohibition includes unlawful facilitation payments. The College also prohibits embezzlement, fraud, forgery, collusion and misuse of .authority to obtain an undue benefit

The College prohibits participation in, funding or facilitation of organized crime, including making College funds, assets, facilities or data available for that purpose. It assesses third-party risks before .engagement and reviews high-risk relationships according to their nature

,The College safeguards the independence of decisions on admissions, scholarships, assessment recruitment and contracting from improper influence. It records disclosures, provides confidential .reporting and prohibits retaliation against good-faith reporters and those who cooperate with inquiries

Preventive and Transaction Controls .3

.Employees immediately disclose actual or suspected conflicts to Human Resources under Article (36) Others covered by the policy disclose them to the authorised body. Anyone with an interest recuses themselves from evaluating, recommending or deciding on the transaction. The disclosure, recusal and .authorised substitute are recorded

Under Article (34), employees may not accept a gift of material value unless it is for advertising or promotional purposes and bears the giver's name and logo. Gifts and hospitality offered to influence a decision or obtain preferential treatment are refused. Relevant offers are recorded. The unit designated .by the College receives or keeps gifts on its behalf in accordance with the law

The relevant unit verifies the identity of suppliers, partners or donors, the capacity of their representatives and any conflicts of interest. For higher risks it extends checks to ownership or source of ,funds as appropriate and as required by law. It applies segregation of duties, approval authorities documentation and fair competition, and prohibits splitting transactions to bypass controls. Integrity .obligations and remedies are included in contracts according to risk

Reporting, Inquiry and Protection .4

The College publishes its confidential reporting channel and instructions for access. A body authorised and independent of the matter records and screens reports and assesses conflicts. If a report concerns a person responsible for the channel or with authority over the inquiry, it is escalated through an .alternative route to the competent higher authority or oversight body, as appropriate

Access to reports and evidence is restricted, and receipt, custody and handling are documented. The authorised decision-maker takes necessary interim measures, including suspending a transaction where appropriate, while preserving the parties' rights. Cases are referred to competent authorities where referral is warranted. Findings, corrective actions, sanctions and grievance routes are documented under .applicable regulations

The College prohibits employment or academic detriment for good-faith reporting or cooperation with inquiries. Suspected retaliation is examined independently, with due regard for the Financial Audit .Authority's whistleblower protection conditions and procedures where applicable

Legal and Institutional References .5

Read this policy with Law No. (10) of 2011 Establishing the College, the federal Crimes and Penalties Law promulgated by Federal Decree-Law No. (31) of 2021, as amended, and Articles (34) and (36) of Dubai Law No. (8) of 2018 Concerning Management of the Government of Dubai Human Resources, as amended. Due regard is given to Law No. (4) of 2018 Establishing the Financial Audit Authority, as amended, Resolution No. (2) of 2025 on whistleblower protection and Law No. (12) of 2020 on .contracts and warehouse management, within their respective scope

Internally, the College's Internal Regulations (QMS-GS01) apply, including financial affairs, the Procurement Committee, tender contracts, acceptance of donations and delegated authorities, together with the Learner Admission Policy (IMC-THE-POL-01) and the Anti-Harassment and Protection from .Retaliation Policy (IMC-THE-POL-05) within its scope

Publication, Monitoring and Review .6

The approved version is published in the Knowledge Management System (KMS) archive accessible to all employees and on the College website through a direct public link. The approval decision, revision history, publication link and aggregated or de-identified implementation evidence are retained. The policy is reviewed every three years or earlier as needed, including when relevant laws, legislation or .regulations are amended or introduced

Evidence for THE 16.2.5 in the 2027 cycle is a public link to the principles and commitments in all three areas, with proof of publication date. A dated public copy or documented publication record showing that it was available at the time establishes publication before 2025. Disclosure, due diligence, awareness and corrective action records are used internally to monitor implementation. Findings are reported in .aggregate

Responsibilities .7

Responsible Unit	Responsibility
Senior Management and the Administrative and Financial Affairs Section	Implement the policy and coordinate transaction controls, due .diligence and corrective action within delegated authority
Human Resources	,Receive employee disclosures and monitor recusal, gift controls .awareness and employment procedures
Academic and Administrative Units and the Procurement Committee	Apply and document controls in decisions and transactions within .their remit and report suspicions
Independent Oversight or Investigation Body	Screen reports, manage conflicts of interest, safeguard evidence and .submit findings to the authorised decision-maker
Office of Institutional Effectiveness and Strategic Planning	Monitor indicator evidence, publication and review with the policy .owner and publishing unit