



الجامعة الإسلامية العالمية ماليزيا
INTERNATIONAL ISLAMIC UNIVERSITY MALAYSIA
يُونِيسَيْتِيْ اِسْلَامْ اِنْتَارَا اِبْحْسَا مِلْسِيَا

Garden of Knowledge and Virtue

LEADING THE WAY

KHALĪFAH • AMĀNAH • IQRA' • RAḤMATAN LIL-'ĀLAMĪN

IIUM CODE OF BUSINESS ETHICS



LEADING THE WAY
KHAUF - AMANAH - IGRA' - RAHMATAN UL-ALAMIN



AN INTERNATIONAL AWARD-WINNING INSTITUTION FOR SUSTAINABILITY

Name of Document:	IIUM Code of Business Ethics	Version:	1
Approving Authority:	Board of Governors	Effective Date:	31st May 2022

TABLE OF CONTENTS

	Page
Executive Summary	6
Responsibility and Accountability	6-7
Definition	7-8
I) IIUM COMMUNITY	
A) IIUM Policies and Procedures	
i Compliance	9
ii Fraud and Ethics Line	9-10
B) Information	
i Confidential and Proprietary Information	11
ii Data Protection	11
iii Recording and Storing of Information	12
C) Assets and Properties	
i Staff's Responsibilities	12
ii Access to the Internet and E-mail	12-13
D) Intellectual Property Rights / Authors of Literary / Artistic Work	13-14
II) IIUM CUSTOMERS	
A) External Customers	
i Integrity and Professionalism	14
ii Relationships	14
iii Gift-Giving	15

B)	Internal Customers	
i	Respect for Another	15
ii	Work Environment	15-16
iii	Conflict of Interest	16
III)	IIUM VENDORS, SUPPLIERS / CONTRACTORS	
A)	Doing Business with Others	
i	In the Interest of the IIUM	16-17
ii	Conflicts of Interest	17
B)	Receiving Business Courtesies	17-18
C)	Giving Business Courtesies	18
D)	Purchasing and Procurement	
i	Acting in the IIUM's Best Interest	18-19
ii	Improprieties or Potential Thereof	19
iii	Commitment on Behalf of the IIUM	19-20
IV)	EXTERNAL PARTIES	
A)	Safeguarding our Reputation	
i	Establishing Business Relationship	20-21
ii	Attempts to Obtain Favourable Treatment/Terms Should be Avoided	21
B)	Stakeholders and Investors	21
C)	Regulators	22

D)	Government Agencies	
i	Dealing with Government Officials or Government Contract	21
ii	Offers and Unlawful Payments Disallowed	22
E)	Competitors	
i	Ethical Practices	23
F)	Media	
i	Queries from Media or Third Parties	23
G)	Political Parties, Non-Governmental Organisations (NGOs) and Non-Profits Organisations (NPOs)	
i	Contributions to Political Parties	23-24
ii	Contributions to NGOs and NPOs	24

Executive Summary

International Islamic University Malaysia (IIUM) is committed to maintaining a high standard of business ethics. We shall conduct business with honesty and integrity and respect the integrity of persons with whom we do business. In conducting our business, we shall apply fair and impartial practices and comply with all laws and regulations. We shall not engage in business practices that may raise questions of the IIUM's integrity, impartiality, or reputation. Should IIUM conducts its business activities outside Malaysia, we shall, in each country where IIUM is active, abide by the laws of that country.

IIUM's employment philosophy, based on respect for the individual, reflects our high ethical standards. We expect and require each Staff, as representatives of IIUM, to also fulfil our commitment to good ethical behaviour.

Responsibility and Accountability

Staff	IIUM Code of Business Ethics (hereinafter referred to as the "Code") together with other relevant IIUM policies, procedures, rules and regulations, and guidelines. All Staff also have responsibility to act honestly and not to commit any fraud activities or to give and receive any corruption gratification. A Staff who is found to have committed fraud or corruption will be subject to disciplinary action and/or legal action.
Vendors and Suppliers/ Contractors	To conform to the principles outlined in the Code in their relationships and dealing with us. We should ensure that our dealings with them are based on professionalism and we shall not participate in any activities that could cloud our business judgment and impair our independence.

The Code cannot anticipate every situation that may arise in today's dynamic and complex environment. Where relevant, this Code should be read in conjunction with the relevant policies, procedures, rules and regulations, and guidelines which are currently in place. If you are faced with an uncertain situation, we expect you to seek help by informing your

Supervisor before taking actions. The Code is designed to help guide ethical decisions and actions. Please use them in your work, and seek additional guidance as needed.

DEFINITIONS

Commitment	means a “commitment” by the University includes the execution of any written agreement or any other undertaking that obligates or binds the University in any aspect
Corruption	<p>refers to the interpretation of “corruption” under the Transparency International means the abuse of entrusted power for private gain – it can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs.</p> <p>For the purpose of this Policy, corruption refers to Four (4) main offences stipulated in the Malaysian Anti-Corruption Act 2009 (MACC Act 2009) [Act 694]:</p> <ol style="list-style-type: none"> 1. Soliciting/Receiving Gratification (Bribe)[Section 16 & 17(a) MACC Act 2009] 2. Offering/Giving Gratification (Bribe)[Section 17(b) MACC Act 2009] 3. Intending to Deceive (False Claim)[Section 18 MACC Act 2009] 4. Using Office or Position for Gratification (Bribe) Abuse of Power/Position) [Section 23 MACC Act 2009] <p>In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.</p>
External Customers	refers to an individual who subscribe or buy the IIUM’s services

Fraud	means an act of deceiving or misrepresenting, an intentional perversion of the truth for personal gain or to damage another individual
Business Associate / Independent Contractors	refers to freelancers and staff of outsourced providing service to the University
Internal Customers	means Staff and students of the University
Rector	refers to the Chief Executive Officer of the University
Relative	refers to the interpretation of “relative” under Section 3, Malaysian Anti-Corruption Commission Act 2009 [Act 694] in relation to a person, means: (a) a spouse of the person; (b) a brother or sister of the person; (c) a brother or sister of the spouse of the person; (d) a lineal ascendant or descendant of the person; (e) a lineal ascendant or descendant of a spouse of the person; (f) a lineal descendant of a person referred to in paragraph (b); (g) the uncle, aunt or cousin of the person; or (h) the son-in-law or daughter-in-law of the person;
Supervisor	refers to an individual within the University to whom Staff reports to i.e. supervisor, line leader, team leader etc.
Staff	means any person employed under a contract of service with the University
University	refers to International Islamic University Malaysia
<u>Abbreviations</u> IIUM OCAP OSIC MSD HOD	International Islamic University Malaysia Office for Communication, Advocacy and Promotion Office for Strategy and Institutional Change Management Services Division Head of Department

I. IIUM COMMUNITY

A. IIUM Policies, Procedures, Rules and Regulations, Guidelines

i. Compliance

- a) IIUM policies, procedures, rules and regulations, and guidelines are necessary for the efficient and effective operation of the IIUM to ensure that the business objectives of the IIUM are achieved in a timely and proper manner.
- b) All policies, procedures, rules and regulations, and guidelines should be strictly adhered to. Failure to do so may result in misconduct and severe disciplinary action may be taken.
- c) Supervisors should use reasonable care to ensure that effective systems of internal controls are in place in their area of responsibility to cover the following:
 - i. Assigning the appropriate authority and responsibility to individuals.
 - ii. Proper authorisation of transactions.
 - iii. Maintaining accurate and adequate records and documentation.
 - iv. Limiting access to confidential assets and information on a need-to-know basis.
 - v. Having independent verifications and approvals.
 - vi. Fostering adequate segregation of duties and avoiding any conflict of interest.
 - vii. Be alert for any indication of fraud, corruption, misappropriation and other irregularities.
- d) If Staff requires further clarification or views any policies, procedures, rules and regulations, and guidelines to be inappropriate or outdated, they may discuss their concerns with their Supervisor.

ii. Fraud and Reporting Line

All Staff are responsible for the detection and prevention of fraud, corruption, misappropriation and other irregularities. Hence, all Staff have a responsibility not only to act honestly but also to report any

instances of possible fraud, corruption, misappropriation or other irregularities to the Ombudsman or office in charge of legal affairs or unit in charge of integrity. For the Ombudsman, it can be reached anonymously via the following channels:

- a) 03-6421 6596 or 6741 or email at ombudsman@iium.edu.my
- b) Letters/documents to be addressed to:

IIUM Ombudsman
Level 4, Muhammad Abdul Rauf Building
International Islamic University Malaysia
Jalan Gombak
53100 Kuala Lumpur

In all instances, confidentiality will be maintained to the fullest extent possible.

A detailed investigation on the incident reported will be conducted. A Staff who is found to have committed fraud or corruption will be subject to the disciplinary action and/or legal action.

Irregularities concerning Staff's moral, ethical or behavioral conduct should be resolved by the department management and the Ombudsman or office in charge of legal affairs or unit in charge of integrity.

All disclosures made or received from the "whistleblower" will be treated as confidential and in accordance with the procedures provided the IIUM Whistleblower Protection Policy. Any information received from the whistleblower will go direct to the Ombudsman.

This IIUM Whistleblower Protection Policy is to encourage Staff to report any concerns or instances of possible fraud, corruption, misappropriation or other irregularities within IIUM. The IIUM Whistleblower Protection Policy makes it clear to Staff that they can report any such concern or wrongdoings within IIUM without fear of victimization, discrimination or disadvantage to them.

B. Information

i. Confidential and Proprietary Information

- a) Disclosure of any confidential and proprietary information is strictly prohibited save and except with written permission by IIUM.
- b) All information with different levels of confidentiality should be appropriately managed, handled and stored in accordance to the Information Classification and Control Policy adopted by IIUM.
- c) Examples of confidential and proprietary information include but are not limited to trade secrets, processes, methods, decisions, advertising or promotional programmes, plans, financial or business forecasts, discoveries or competitive bids, customer and Staff information that is not available publicly.
- d) Where confidential information is to be disclosed to persons outside of the IIUM, a non-disclosure agreement should be entered into by the parties to ensure that such confidential information is protected.

ii. Data Protection

- a) All confidential and proprietary information must remain confidential until it is in the public domain. Such confidential information shall include but are not limited to matters concerning securities, financial condition, earnings or activities of the IIUM and information that is particularly sensitive such as knowledge of acquisitions and disposals, new products or processes, audit reports, earnings figures and trends and any material information that may affect the IIUM's business and reputation.
- b) All confidential and proprietary information of the IIUM should be properly classified and labelled to ensure that such information is only disseminated to the correct person.
- c) Unauthorised dissemination of information is not permitted. Every Staff should seek clarification or proper authorisation from their Supervisor prior to distributing confidential, proprietary or sensitive information

iii. Recording and Storing of Information

- a) Staff should ensure honest and accurate recording and reporting of all information on the IIUM's records (including personal information) in order to avoid any misrepresentation or disclosure of misleading information.
- b) Staff involved in the financial recording processes that in any way affects the integrity or accuracy of financial statements and internal management reports must ensure that transactions are complete and recorded accurately and promptly.
- c) All business records and communications must be clear, complete, truthful and accurate, and Staff must avoid any fabrication, exaggeration, guesswork, or record offensive remarks or descriptions of people and companies.
- d) Any intentional act to cover up or misrepresent the true nature of a record or transaction is a clear breach of these principles.

C. Assets and Properties

i. Staff's Responsibilities

- a. Staff are expected to use all reasonable care to safeguard the IIUM's property and assets to avoid any loss, damage, misuse, illegal use or theft. Staff are liable for any loss arising out of their negligence.
- b. Staff are not to use IIUM property or assets for personal reasons other than for the business of the IIUM, or remove any IIUM property from the premises, unless prior authorisation is obtained from their supervisor.

ii. Access to the Internet and E-mail

- a) IIUM will provide internet and e-mail access to Staff who need such access for work purposes and specifically for the purpose of increasing productivity relating to the job function of that Staff. Internet access is not meant for personal activities.

- b) Occasional and reasonable personal use is acceptable during meal times, other breaks or outside scheduled working hours, provided this does not interfere with the performance of work duties and responsibilities.
- c) Staff with internet and email access should not use such network access to engage in illegal activities, personal attacks, other non-professional conduct, political use or in any activity which will bring the IIUM into disrepute. Staff must ensure responsible usage of the internet and e-mail access and such usage must be in compliance with the ICT Policies and Procedures. Any non-compliances will result in disciplinary actions being taken against the Staff.

D. Intellectual Property Rights/ Authors of Literary/ Artistic Work

- a) In the ordinary course of the business with IIUM, Staff is expected at all time to protect the intellectual property rights including but not limited to IIUM's name, logo and ensure compliance with the applicable laws and regulations.
- b) IIUM is fully committed to the protection of the rights of inventors, authors and owners of literary and artistic works and the copyright thereof, and will comply with appropriate international and local laws with respect to their use, reproductions, translation, adaptations and arrangements of these inventions, literary and artistic works.
- c) All Staff have obligations to:
 - i. Acknowledge that any intellectual property created by Staff in the performance of their job responsibilities belongs to the IIUM;
 - ii. Report any unauthorized use of the IIUM's copyrights, patents, service marks and trademarks to their Supervisor;
 - iii. Respect and comply with the conditions of use of all intellectual property that the IIUM has secured or acquired from third parties under confidentiality or license agreements or otherwise;
 - iv. Obtain permission to use a third party's trademark, service mark or other intellectual property; and

- v. Use inventions patented by third parties only within the terms of a license agreement.

Except with the written permission of IIUM, the Staff is refrain from making copies of copyright-protected materials without the prior written consent of the IIUM.

II. IIUM CUSTOMERS

A) External Customers

i. Integrity and Professionalism

- a) IIUM recognises that customer satisfaction is of primary importance.
- b) Everyone is encouraged to treat all customers professionally in business transactions, and provide a high level of customer service to address any dissatisfaction or complaints.
- c) All of marketing and advertising messages shall be accurate and truthful. Any disclosure of marketing information must be cleared by the appropriate channels. Deliberately misleading messages, omissions of important facts, or false claims about our offerings or that of our competitors are not acceptable.
- d) Staff should obtain customer feedback on an on-going basis to identify areas for improvement.

ii. Relationships

- a) Staff must protect and maintain the privacy and integrity of our customer's personal data as appropriate.
- b) No Staff should use the customer's personal data for their own or anyone else's use or disclose the information to any unaffiliated third parties; unless authorised to do so by the relevant authority or by law.

iii. Gift-Giving

- a) All gift-giving by Staff should be channeled through the HOD.
- b) Appropriate gift-giving would include modest items for promotional purposes only with the IIUM's logo clearly imprinted on the item.
- c) Staff should not make payments to third parties to secure sales or obtain favourable terms or treatment.

B) Internal Customer

i. Respect for Another

- a) IIUM should treat all of our internal customers with the same level of professionalism, dignity and respect as that of our external customers. As such, Staff shall conduct ourselves in a professional manner and demonstrate the highest regard for one another and shall treat each other with respect, dignity and avoid any language or behavior that intimidates or offends others in any dealings with them.
- b) Harassment includes verbal, physical and visual conduct that creates an offensive, hostile and intimidating working environment or that interferes with work performance.
- c) Staff who believes that he or she has been the subject of harassment by another Staff, subordinate or superior should promptly report the incident to their supervisor or the Office of Ombudsman depending on circumstances. All reports will be recorded in confidence and reviewed to determine the appropriate action to be taken as detailed in the Staff Disciplinary Rules.

ii. Work Environment

- a) IIUM is committed to foster or nurture an environment that promotes good relations between one another by:
 - i. Working towards creating a friendly and non-hostile environment.
 - ii. Cooperating with one another to achieve corporate goals and objectives).

- iii. Having pride in what the Staff is doing and enjoying working with the people they deal with.

iii. Conflict of Interest

- a) Staff should not supervise, nor be in a position to influence the hiring or assessments of a Relative.
- b) The potential for a conflict of interest exists if a Staff's Relative for the IIUM, become related to each other subsequent to employment with the IIUM or if two Staff choose to start a personal relationship with one another. Relatives of current Staff may not occupy a position that will be working directly for or supervising the existing Staff. Neither the Staff nor the Relative should perform work of a confidential nature.
- c) Staff must also avoid situations in which the Staff' personal interests may conflict with the interests of the IIUM.

III. IIUM VENDORS, SUPPLIERS / CONTRACTORS

A) Doing Business with Others

i. In the Interest of the IIUM

- a) All business decisions and actions taken should be based on sound, objective and independent judgement that is in the best interest of the IIUM, and must not be motivated by personal considerations or relationships, whether real or perceived.
- b) The IIUM insists on honesty, integrity and fairness in all aspects of its business and expects the same in IIUM relationships with all those with whom IIUM do business. The direct or indirect offer, payment, soliciting and acceptance of bribes in any form or manner are unacceptable practices.
- c) Business transactions on behalf of the IIUM should be legitimate and on arms-length basis, reflected accurately and fairly in the financial accounts of the IIUM in accordance with established policies and procedures.
- d) Staff should not work for, or receive any form of payments (in

cash or in kind) for services or goods rendered from any third party, which includes but not limited to, competitors, customers, distributors or suppliers, without the prior written approval of the IIUM; that might compromise, or even appear to compromise, our objective and honest assessment of the product or service, quality, price and performance. This includes inducement or false promises for a contract in the future.

ii) Conflict of Interest

- a) Conflict is deemed to exist when a Staff's activities on behalf of the IIUM causes him or her, or another party, to obtain an improper gain or advantage, whether or not such gain or advantage adversely affects the IIUM's interests.
- b) Staff should notify their Supervisor in writing immediately upon becoming aware of a conflict, whether real or perceived, either involving him/herself, another Staff or a third party.
- c) Staff should not use any personal influence to get the IIUM to do business with another party in which the Staff's family members or friends have an interest.
- d) There may be occasions where a Staff may be engaged to undertake freelance assignments for the IIUM that do not constitute part of the normal job responsibilities. Staff are to abide by the Staff Disciplinary Rules or any other relevant policies, procedures, rules and regulations, and guidelines.

B) Receiving Business Courtesies

- a. Staff should not accept gifts, the use of services or entertainment or gratuities of more than nominal value (approximately RM500 or equivalent amount in value) given by third parties having dealings with the IIUM.
- b. Promotional gift items with the companies' logo (such as pens, mugs, calendars and umbrellas) of nominal value are acceptable, as is entertainment within the limits of responsible and acceptable business practices.

- c. Under no circumstances is it acceptable to solicit, or receive any form of bribe, kickback or gratuities. This principle applies to all IIUM transactions everywhere in the world, even where the practice is widely considered as “a way of doing business”.
- d. There are some cases where refusal to accept an inappropriate gift or entertainment would cause embarrassment or hurt to the person offering it. This is particularly true when the Staff is a guest in another country and the gift and entertainment is something that the country host offers as part of a public occasion. In these instances, the best practice is usually to accept the gift on behalf of the IIUM, report it to your Supervisor and turn the give over to the IIUM.
- e. Exceptions to the above:
 - i. When suppliers and/or contractors are asked to donate gift items for Staff gatherings or events, it will be officially requested by the IIUM and the organizing committee will issue a receipt to acknowledge receipt of the items. Such gifts are to be distributed or given either through competitions or promotions.
 - ii. Festive seasons whereby such gifts are customarily to be distributed or given to the University.

C) Giving Business Courtesies

Some business situations may require the giving of gifts. In such circumstances, the gifts must be legal, reasonable and approved by the respective Supervisor and HOD. The gifts given should not appear to compromise our integrity, professionalism and business judgment. However, Staff are strictly prohibited from offering or giving bribes.

D) Purchasing and Procurement

i. Acting in the IIUM's Best Interest

- a) All procurement and purchasing decisions should be based solely on the IIUM's best interest, covering product or service suitability, price, delivery and quality. The lowest price may not always be accepted if it compromises quality and suitability. Other considerations include:

- i. Treating all suppliers equally and all are afforded the same information at the same time.
 - ii. Confidentiality by ensuring that no information is disclosed during the procurement process.
 - iii. More than one supplier / bidder.
 - iv. Check and balance amongst Staff, if more than one Staff is involved.
 - v. Other commercial and operational considerations as advised by relevant units with the IIUM.
- b) All Staff should comply with the IIUM Purchasing Policies for procurement of goods and services.

ii. Improprieties or Potential Thereof

- a) Unless specific written exemption has been obtained from Quotation/Tender Committee, quotation /tenders shall not be solicited from any supplier / contractor owned or controlled by any Staff or his /her immediate family or his/her relatives and friends.
- b) All members of the Quotation/Tender Committee are required to maintain strict confidentiality and declare any conflict of interest to ensure transparency and objectivity of the tender process. Any Quotation/Tender Committee member who finds him or herself in conflict or potential conflict shall exclude himself / herself from the Quotation/ Tender Committee.

iii. Commitment on behalf of the IIUM

- a) All monetary commitments should be approved according to the approved financial authority.
- b) Authorisation and approval of the budget or operating plan is not, on its own, authorisation to spend the money. Approval to incur the expenditure is still required even though it is budgeted for.
- c) No individual is allowed to:
 - i. Approve his / her own claims or expenses for payment.
 - ii. Approve a requisition, place an order, receive goods or approve an invoice for payment all by him or herself.
 - iii. Breakdown the total value of the procurement into

multiple purchase requisitions to evade limits established by management including approval authorities and competitive bidding.

- d) Staff can only delegate their financial authority to line subordinates in the functional area that they are responsible for, and the delegation should be time and task specific with approval of their Supervisor. Such delegation should be documented, communicated and agreed by the relevant parties. However, the delegator is still accountable for the performance of the delegated task. The line subordinate who has been delegated the authority is not allowed to further delegate or sub-delegate the authority given to them.

IV. EXTERNAL PARTIES

A. Safeguarding Our Reputation

i. Establishing Business Relationships

- a) IIUM to comply with all applicable laws, regulations, rules, directives and guidelines in every country in which the IIUM operates. When any doubt exists as to the legality of any matter, the matter should be forwarded to the office in charge of legal affairs.
- b) Staff should provide timely and quality service and deal with customers competently and fairly.
- c) Staff should not do business with parties or appoint third parties who are likely to harm the IIUM's reputation and business interest.
- d) Only Staff who are specifically authorised by the IIUM may make any commitment, whether it involves payment of money or not, on behalf of the IIUM. Staff should never execute a document or otherwise commit the IIUM unless they have clear authority to do so. When in doubt, they should check with the relevant persons of the IIUM to determine the financial authority delegated to them and the extent and terms of any commitment.
- e) Staff should not speak on behalf of the IIUM without proper authority. Staff are to forward requests for information from external parties to the OCAP.
- f) Staff should only make and coordinate the due delivery of promises

which Staff can fulfill.

ii. Attempts to Obtain Favorable Treatment / Terms Should Be Avoided

- a) Staff should not make payments or provide gifts of substantial value or extravagant entertainment to third parties to solicit, induce or secure sales or obtain favourable terms or treatment.
- b) Assistance or entertainment given to third parties to IIUM should not compromise, or even appear to compromise, our integrity and business judgement.
- c) If in doubt, the respective HODs/ Staff should consult with office in charge of legal affairs.

B. Stakeholders and Investors

- i. IIUM should conduct its operations in accordance with internationally accepted principles of good corporate governance and generally accepted accounting practices.
- ii. IIUM stakeholders have a right to obtain all information on the IIUM (including its annual reports, quarterly announcements and all information which is likely to materially impact its reputation), its activities and its management on a timely and regular basis. As such, authorised Staff should provide full, fair, accurate, timely, objective, understandable, regular and reliable information on the IIUM's activities, policies, structure, financial situation, performance, achievements and prospects to IIUM stakeholders and potential investors.
- iii. IIUM should maintain a communications policy to facilitate effective communication with its stakeholders and investors.
- iv. All queries and requests from the stakeholders and investors should be forwarded to the OSIC to ensure a professional and consistent approach in addressing such matters.
- v. Authorised Staff should use a suitable communication media to inform stakeholders and investors in a prompt and uniform manner.
- vi. However, authorised Staff must not disclose information that may compromise the IIUM's competitive position or result in a breach of contractual limitation against disclosure unless such disclosure is necessary and appropriately authorised.

C. Regulators

- i. As far as possible, Staff who deal with regulators are expected to know, understand and comply with all applicable laws, regulations, rules, directives and guidelines in every country in which the IIUM does business. When any doubt exists as to the legality of any matter, the matter should be forwarded to the office in charge of legal affairs. All requests for information from regulators (either routine or non-routine) should be forwarded to the relevant departments for further action.

D. Government Agencies

i. Dealing with Government Officials or Government Contracts

- a) As far as possible, Staff who deal with Government Officials or contracts are expected to know, understand and comply with all applicable laws, regulations, rules, directives and guidelines in every country in which the IIUM does business. When any doubt exists as to the legality of any matter, the matter should be forwarded to the Office of Legal Adviser.
- b) All requests for information (either routine or non-routine) from government officials or agencies should be forwarded to the relevant departments for further action.

ii. Offers and Unlawful Payments Disallowed

- a) IIUM should not directly or indirectly offer to make any unlawful payments or benefits to government officials and regulators, including Staff of statutory bodies and state-owned enterprises.
- b) This requirement applies to both Staff and agents of the IIUM, such as service agents and dealers, irrespective of geographical location, as part of the terms of their engagement.
- c) IIUM should ensure that the agents engaged by the IIUM are reputable. IIUM to use best endeavours to require the agents to agree in writing to all applicable IIUM policies.

E. Competitors

i. Ethical Practices

- a) IIUM shall always compete aggressively, but shall treat its competitors fairly. The IIUM shall market its services and solutions on their merits and shall not criticise or provide misleading information about its competitors.
- b) Staff should conduct the business affairs of the IIUM in a fair and lawful manner.
- c) It is never appropriate for us to obtain information about a competitor or trade secret information through improper means or without the owner's consent.
- d) Unfair methods of competition, and unfair or deceptive acts or practices which affect fair competition should be avoided.
- e) Staff should promote the IIUM's products and services fairly and honestly, stressing their benefit, quality and value.
- f) IIUM to comply with the antitrust and unfair competition laws, regulations, rules, directives and guidelines of the many countries in which the IIUM does business.

F. Media

i. Queries from Media or Third Parties

- a) All queries and requests from the media should be forwarded to the OCAP to ensure a professional and consistent approach in addressing such matters.
- b) Staff should not speak on behalf of the IIUM without proper authority or delegation.

G. Political Parties, Non-Governmental Organisations (NGOs) and Non-Profit Organisations (NPOs)

i. Contributions to Political Parties

- a) IIUM should not engage in any corporate political activities on behalf of the IIUM without first obtaining written consent from the Rector, in all cases, only for proper purposes and formal means.
- b) Staff must not make any political contribution on behalf of the IIUM

or use the IIUM's name, cash or in-kind contributions, property, equipment or services for the support of political parties, initiatives, committees or candidates.

- c) Use of the IIUM's name to endorse a political activity or event is not permitted.
- d) Staff however, remain free to make contributions in their personal capacity.

ii. Contributions to NGOs and NPOs

- a) The IIUM acknowledges the involvement by its Staff as private individuals, as long as it is clear that they are not representing the IIUM in such activities. Staff should also ensure that our outside activities do not interfere with our job performance and all involvement has to be done at our own time and expense.
- b) In cases of NGOs and NPOs, any contributions to be made on behalf of the IIUM should have prior written approval of the Rector.
- c) Use of the IIUM's name to endorse a charitable organisation or event is not permitted without prior approval by the Rector.
- d) No Staff may pressure another Staff to either express a view that is contrary to their personal belief, to contribute, or to support charitable causes

DISCLAIMER:

IIUM may amend this Code at any time so as to improve its effectiveness at combating bribery and corruption



International Islamic University Malaysia
P.O. Box 10, 50728 Kuala Lumpur

Phone: (+603) 6421 6421

Fax: (+603) 6421 4053

Email: webmaster@iium.edu.my