

**Ateneo de Zamboanga University**  
**ANTI-FRAUD AND ANTI-CORRUPTION POLICY**

**PREAMBLE**

Ateneo de Zamboanga University (AdZU), as a Jesuit institution committed to the Ignatian ideals of *magis, cura personalis*, and service to the greater good, upholds the highest standards of integrity, transparency, accountability, and ethical conduct in all of its operations and transactions.

In recognition of its responsibility to its students, faculty, staff, donors, partner institutions, regulatory bodies, and the broader community it serves, AdZU acknowledges that fraud and corruption pose serious threats not only to the University's financial resources but also to its institutional mission, reputation, and public trust.

This Anti-Fraud and Anti-Corruption Policy is hereby established to clearly define the University's zero-tolerance stance against fraud and corruption in any form, to prescribe the mechanisms for prevention, detection, reporting, investigation, and sanctions, and to ensure compliance with applicable laws and regulations of the Republic of the Philippines.

**SECTION 1. POLICY STATEMENT**

Ateneo de Zamboanga University is firmly committed to preventing, detecting, and responding to all forms of fraud, corruption, bribery, and dishonest conduct involving University resources, processes, and personnel. This commitment extends to all officers, administrators, faculty members, non-teaching staff, contractual employees, students holding institutional responsibilities, vendors, contractors, and other parties transacting with the University.

The University shall pursue all instances of fraud and corruption through appropriate administrative, civil, and/or criminal proceedings, regardless of the position or tenure of the individual involved.

**SECTION 2. OBJECTIVES**

This Policy aims to:

- Establish a clear institutional framework for preventing and addressing fraud and corruption within the University.
- Define the roles and responsibilities of University personnel in upholding this Policy.
- Prescribe standardized procedures for reporting, investigating, and resolving suspected incidents of fraud or corruption.
- Protect whistleblowers and reporting parties from retaliation or harassment.
- Promote a culture of honesty, integrity, and accountability throughout the University community.

**SECTION 3. SCOPE AND COVERAGE**

This Policy applies to:

- All regular, contractual, and part-time employees of AdZU, including faculty and non-teaching staff.
- University administrators and officers at all levels, including members of the Board of Trustees.
- Students exercising official functions or managing University funds or resources.
- Third parties transacting with the University, including contractors, suppliers, donors, service providers, and partner institutions.
- Alumni and other stakeholders engaged in official University activities.

This Policy covers all transactions, activities, and decisions involving University funds, properties, assets, records, and operations, whether conducted on-campus or off-campus, domestically or internationally.

**SECTION 4. DEFINITION OF TERMS**

<b>TERM</b>	<b>DEFINITION</b>
<b>Fraud</b>	Any intentional act or omission designed to deceive, misrepresent, or conceal facts for the purpose of obtaining an unauthorized financial or non-financial benefit, or causing loss to the University or its stakeholders. This includes, but is not limited to, misappropriation of assets, falsification of records, financial statement fraud, and procurement fraud.

<b>Corruption</b>	The abuse of entrusted power for personal gain, encompassing bribery, kickbacks, extortion, favoritism, nepotism, and other forms of dishonest conduct that compromise the integrity of University processes.
<b>Bribery</b>	The offering, giving, receiving, or soliciting of any item of value in exchange for influence or favorable action, including cash, gifts, entertainment, commissions, or other advantages.
<b>Conflict of Interest</b>	A situation in which a person's private interests could improperly influence the performance of their official duties or University related responsibilities.
<b>Misappropriation</b>	The unauthorized, improper, or dishonest use of funds, property, or other assets belonging to or entrusted to the University.
<b>Whistleblower</b>	Any person who, in good faith, reports suspected fraud or corrupt activities under this Policy.
<b>Respondent</b>	The individual against whom a complaint of fraud or corruption has been filed.

## SECTION 5. PROHIBITED ACTS

The following acts are strictly prohibited and shall constitute violations of this Policy:

### 5.1 Fraudulent Acts

- Falsification, alteration, or destruction of official University records, financial statements, reports, or documents.
- Misrepresentation of facts, credentials, qualifications, or accomplishments.
- Unauthorized use, diversion, or misappropriation of University funds, properties, or resources.
- Submission of fictitious, inflated, or duplicate claims for reimbursement, allowances, or benefits.
- Procurement fraud, including bid rigging, price manipulation, and collusion with suppliers.
- Ghost employees, ghost deliveries, or phantom transactions.
- Computer and technology fraud, including unauthorized access, manipulation, or hacking of University systems.

### 5.2 Corrupt Practices

- Soliciting, accepting, or offering bribes, gifts with corrupt intent, kickbacks, or any form of improper advantage.
- Abuse of authority or position for personal gain.
- Nepotism, favoritism, or discrimination in hiring, promotion, procurement, or other University processes.
- Interference in investigation, audit, or disciplinary proceedings.
- Coercion or intimidation of witnesses, complainants, or investigators.
- Undisclosed conflicts of interest that affect University decisions.

## SECTION 6. ROLES AND RESPONSIBILITIES

This policy shall be implemented through the University's existing institutional offices, each with defined roles and responsibilities as set out below. This structure ensures accountability without adding unnecessary bureaucratic layers.

### 6.1 Board of Trustees

- Approves this Policy and any amendments thereto.
- Provides governance-level oversight of the University's anti-fraud and anti-corruption program.
- Reviews and acts on cases involving the University President or senior officers.
- Receives periodic reports from the Internal Audit Office on the status of fraud risk management.

### 6.2 Office of the President

- Champions the implementation and institutional culture of this Policy.
- Receives escalated investigation reports from the Internal Audit Office.
- Approves final sanctions for substantiated fraud and corruption cases, upon recommendation of the Human Resource Administration and Development Office and/or the Legal Adviser.
- Refers cases requiring criminal or civil action to the Legal Adviser.
- Serves as the final internal appellate authority for disputed decisions under this Policy.

### **6.3 Internal Audit Office (IAO)**

- Receiving, recording, and acknowledging all reports of suspected fraud or corruption.
- Conducting initial assessment of reports to determine whether formal investigation is warranted.
- Leading or coordinating formal investigations, with the authority to access all University records, accounts, systems, and personnel relevant to the investigation.
- Coordinating with the Legal Adviser, Human Resource Administration and Development Office, and Finance Office during investigations.
- Preparing and submitting Investigation Reports with findings and recommendations to the University President.
- Maintaining a confidential fraud and corruption case registry.
- Reporting significant fraud risk findings to the University President and, as appropriate, to the Board of Trustees.

### **6.4 Legal Adviser**

- Provides legal advice and guidance to the IAO and other offices during investigations.
- Reviews Investigation Reports for legal sufficiency and due process compliance.
- Coordinates the filing of criminal complaints or civil actions against respondents where warranted.
- Advises the University President on applicable laws, penalties, and legal risks arising from fraud and corruption cases.

### **6.5 Human Resource Administration and Development Office (HRADO)**

- Administers disciplinary proceedings against University personnel in accordance with applicable labor laws and University policies, upon receipt of a final Investigation Report from the IAO.
- Issues notices, conducts hearings, and prepares recommendations for administrative sanctions.
- Maintains personnel records of disciplinary actions taken under this Policy.
- Integrates anti-fraud and anti-corruption awareness into employee orientation and training programs.

### **6.6 Finance Office**

- Maintains and strengthens internal financial controls to prevent and detect fraud.
- Flags financial anomalies, unexplained variances, and suspicious transactions to the IAO.
- Assists the IAO in financial investigations, including tracing of funds, reconciliation of accounts, and documentation of financial losses.
- Implements corrective financial controls recommended by the IAO following investigations.
- Ensures proper segregation of duties in all financial transactions.

### **6.7 Office of the Vice President for Administration**

- Provides administrative coordination support to the other offices in the implementation of this Policy.
- Oversees cross-office cooperation and ensures timely responses to investigation requests.
- Assists in the implementation of corrective and preventive measures recommended after investigations.

### **6.8 All University Personnel**

- Familiarize themselves with this Policy and comply with its provisions at all times.
- Report any suspected fraud or corruption through the prescribed reporting channels in good faith.
- Cooperate fully with any investigation conducted under this Policy.
- Refrain from engaging in any act that constitutes fraud, corruption, or any prohibited act enumerated in this Policy.

## **SECTION 7. PREVENTION MEASURES**

### **7.1 Internal Controls**

The Finance Office, in coordination with the Internal Audit Office, shall maintain a robust system of internal controls designed to prevent and detect fraud and corruption, including:

- Segregation of duties in all financial and procurement transactions.
- Authorization and approval hierarchies for disbursements, contracts, and asset management.
- Regular reconciliation of accounts and physical verification of assets.
- Periodic internal and external audits conducted by the IAO and external auditors.

## **7.2 Code of Ethics**

All University personnel shall be required to sign and adhere to the University's Code of Ethics, which embodies the principles of honesty, integrity, accountability, and professionalism. The Human Resource Administration and Development Office shall ensure compliance and maintain signed acknowledgment records.

## **7.3 Gifts and Entertainment Policy**

University personnel shall not solicit, accept, or give gifts, entertainment, or other benefits that could be construed as influencing their official decisions or actions. Nominal tokens not exceeding Five Thousand Pesos (PHP 5,000.00) in value may be accepted if they are clearly goodwill gestures, subject to written disclosure to the immediate supervisor within five (5) working days of receipt.

## **7.4 Conflict of Interest Disclosure**

All personnel holding positions of authority shall submit annual Conflict of Interest Disclosure Statements. Any actual, potential, or perceived conflict of interest must be disclosed immediately and appropriate recusal observed.

## **SECTION 8. REPORTING MECHANISMS**

### **8.1 Reporting Channels**

Any person who suspects or has knowledge of fraud or corrupt activities shall report such concerns through any of the following channels:

- Direct report to the Internal Audit Office (IAO).
- Written complaint submitted directly to the Office of the President (for cases involving senior officers or the IAO itself).

### **8.2 Contents of a Report**

A fraud or corruption report should, to the extent possible, contain:

- Nature and description of the suspected fraudulent or corrupt act.
- Parties involved, if known.
- Date(s), location(s), and circumstances of the incident.
- Supporting evidence or documents, if available.
- Identity of the reporter (for non-anonymous reports).

### **8.3 Good Faith Reporting**

Reports made in good faith shall be treated with utmost confidentiality. The University shall protect reporting individuals from any form of retaliation, harassment, demotion, or adverse action. Reports made in bad faith or with malicious intent shall be subject to appropriate sanctions.

## **SECTION 9. INVESTIGATION PROCEDURES**

### **9.1 Initial Assessment**

Upon receipt of a report, the Internal Audit Office shall conduct an initial assessment within five (5) working days to determine whether the allegations, if proven true, would constitute a violation of this Policy and whether a formal investigation is warranted.

### **9.2 Formal Investigation**

If the IAO determines that a formal investigation is warranted, it shall proceed as follows:

1. Issue a written Notice of Investigation to the respondent within five (5) working days of the decision to investigate, stating the nature of the allegations.
2. Notify the Office of the President and, where personnel are involved, the HRADO.
3. Collect and preserve evidence, including financial records, documents, digital files, and testimonies, with full access to all University systems and offices.
4. Conduct interviews of relevant witnesses and afford the respondent the opportunity to be heard.
5. Prepare a written Investigation Report containing findings, conclusions, and recommendations, and submit it to the University President within thirty (30) working days from the start of formal investigation, extendable for complex cases upon approval of the University President.

### **9.3 Post-Investigation Actions**

Upon receipt of the Investigation Report, the University President shall:

- Endorse the report to HRADO for the initiation of formal disciplinary proceedings against University personnel, if warranted.
- Endorse the report to the Legal Adviser for legal action, if warranted.
- Direct the Finance Office to implement corrective financial controls.

- Act on the case within fifteen (15) working days of receipt of the Investigation Report.

#### **9.4 Due Process**

The respondent shall be afforded the right to be informed of the charges, to present evidence and witnesses in their defense, to be represented by counsel during formal proceedings, and to appeal adverse decisions in accordance with the University's existing policies and applicable law.

#### **9.5 Confidentiality**

All parties involved in the investigation: investigators, complainants, witnesses, and respondents, are bound by strict confidentiality. Unauthorized disclosure of investigation proceedings shall be subject to sanctions.

### **SECTION 10. SANCTIONS AND CONSEQUENCES**

#### **10.1 Administrative Sanctions**

Personnel found guilty of fraud or corruption after due process shall be subject to administrative sanctions commensurate with the gravity of the offense, including but not limited to:

- Written reprimand or censure.
- Suspension without pay.
- Demotion or reassignment.
- Termination or dismissal from University service.
- Perpetual disqualification from re-employment with the University.

#### **10.2 Civil and Criminal Liability**

The University reserves the right to pursue civil action for the recovery of losses and criminal prosecution of offenders through appropriate legal authorities, regardless of the administrative action taken.

#### **10.3 Restitution**

Persons found liable for fraud or misappropriation shall be required to make full restitution of the amounts defrauded or misappropriated, with applicable interest and charges.

#### **10.4 Third Party Violations**

Vendors, contractors, or external parties found to have engaged in fraudulent or corrupt dealings with the University shall be subject to termination of contracts, blacklisting from future University transactions, and referral to the Legal Adviser for appropriate legal action.

### **SECTION 11. WHISTLEBLOWER PROTECTION**

The University commits to providing full protection to all individuals who report fraud or corruption in good faith. Through the Human Resource Administration and Development Office and the Office of the University President, such protections shall include:

- Strict confidentiality of the identity of the reporting person, to the extent permitted by law.
- Protection from retaliation, harassment, intimidation, adverse employment actions, or academic sanctions.
- Access to assistance and support mechanisms as coordinated by the Human Resources Office.

Any individual found to have retaliated against a whistleblower shall be subject to disciplinary action under this Policy, administered by the HRADO, and may be subject to applicable civil and criminal sanctions.

### **SECTION 12. POLICY REVIEW AND AMENDMENT**

This Policy shall be reviewed at least once every three (3) years by the Internal Audit Office, or as may be warranted by changes in applicable laws, regulations, accreditation standards, institutional practices, or other relevant circumstances. Proposed amendments shall be reviewed by the Legal Adviser, endorsed by the University President, and submitted to the Board of Trustees for final approval.

### **SECTION 13. EFFECTIVITY**

This Policy shall take effect upon approval by the Board of Trustees and shall supersede all prior issuances, memoranda, or guidelines inconsistent herewith.

**Approved**, this 23<sup>rd</sup> day of May, 2026

*(ORIGINAL SIGNED)*

**Fr. Guillrey Anthony M. Andal, SJ**  
University President

*(ORIGINAL SIGNED)*

**Pedro Rufo N. Soliven**  
Chair

*(ORIGINAL SIGNED)*

**Fr. Xavier L. Olin, SJ**  
Trustee

*(ORIGINAL SIGNED)*

**Ruth Yu Owen**  
Vice Chair

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**Fr. Joseph Y. Haw, SJ**  
Trustee

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**Engr. Ibrahim M. Nuño**  
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**Fr. Mars P. Tan, SJ**  
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