

FRAUD AND CORRUPTION PREVENTION (DLI) PROCEDURE

Section 1 - Preamble

- (1) This Procedure is effective from 15 December 2025.

Section 2 - Purpose

- (2) This Procedure outlines the University's management of allegations of fraud and corrupt conduct and must be read in conjunction with the Integrity policy.

Section 3 - Scope

- (3) This Procedure applies to members of the University.
- (4) During the establishment of DLI, all policy, procedures and supporting processes will be regularly reviewed. In the establishment phase, defined as the first two years from when students commence DLI programs, any issues arising from the implementation of current policy, procedure or process will be referred to a jointly-convened Policy and Procedure Review Panel (PPRP). The PPRP will comprise designated academic and professional service representatives from the University Partners and the Office of the Rector. The PPRP will recommend an outcome best aligned with relevant principles and the best interests of any student(s), staff and/or associates concerned, and will advise DLI on the future development of policy, procedure and supporting processes. During the establishment phase, the PPRP may make recommendations to vary any given policy only with endorsement from relevant University Partner governance processes. All policy and procedure will be subject to a full review at the end of the two-year establishment phase.

Section 4 - Policy

- (5) The University is committed to establishing and maintaining a culture of honesty, transparency and accountability, upholding the highest standards of legal, ethical and moral behaviour in its stewardship of public and private funds in the pursuit of its objects. It achieves this by:
 - a. establishing the Code of Conduct (which applies to staff), the Student Code of Conduct and other codes, policies and standards (including in relation to research standards) which require all individuals acting on its behalf to conduct business honestly, ethically and professionally;
 - b. promoting and enforcing standards of conduct that require individuals to be responsible and accountable for their own behaviour and to support others in adopting ethical practices reflecting the University's no tolerance of fraud, corruption and improper conduct, particularly through induction and staff education and training, as well as the application of relevant policies, procedures and processes;
 - c. taking action to identify and address the risk of fraud and corruption within the University and its controlled entities, and thereby effectively preventing, deterring and detecting it through appropriate policies, internal controls, investigation, reporting, education and independent auditing;

- d. supporting and facilitating the making of disclosures, protecting the discloser and having no tolerance for detrimental action against any person who reports wrongdoing.

Section 5 - Procedure

Prevention

- (6) The University's ethical environment is reinforced through robust corporate governance measures and transparency and accountability, minimising opportunities for fraudulent and corrupt conduct, and maximising detection and exposure of error and non-compliance.
- (7) The University has in place a range of preventative strategies and controls that apply to key risk areas and provide guidance to staff about required processes, delegations and approvals which aim to prevent fraud and corrupt conduct in these activities. The relevant policies and procedures include this Procedure and the following:
 - a. Gifts and Hospitality Acceptance procedure
 - b. Business Expenses Policy
 - c. Credit card Policy
 - d. Declaration of Interest procedure
 - e. Contracts & Financial Delegations Policy
 - f. Employment of Staff Policy
 - g. Procurement policy and Procurement Procedure
- (8) Staff are required to report any breaches or non-compliance in accordance with the Compliance Management policy.

Detection, reporting and investigation

- (9) All staff and associates of the University and its controlled entities who become aware of suspected fraud, corruption or improper conduct must report the matter to the University promptly, to:
 - a. the Rector; or,
 - b. the DLI Finance function; or
 - c. if the matter involves the Rector and/or the DLI Finance function to Partner Universities.
- (10) Ideally a report of suspected fraud, corruption or improper conduct should include: a description of the alleged incident, who was involved, where and when the incident occurred, an estimate of the impact, and any available and relevant documentary evidence such as correspondence, receipts or invoices etc. Staff must ensure relevant documents and evidence is preserved.
- (11) A student or a member of the public may report a suspicion or allegation of fraud or corruption to:
 - a. a staff member or a university contact point. All such reports must be forwarded to the Rector or DLI Finance function for investigation in accordance with this Procedure. If the report implicates the Rector or DLI Finance function, it must be made or forwarded to the Partner Universities; or

- (12) A report of known or suspected fraud, corruption or improper conduct shall be treated as confidential and may be used and disclosed in accordance with this Procedure on a 'need-to-know' basis only.
- (13) The Rector or delegate (or other office responsible for the investigation of the allegation appointed by the Partner Universities, who will then be deemed to have the same powers as the Rector under this Procedure) may undertake or commission a preliminary investigation and may seek advice from the Legal advisors including in relation to the applicable University process and any external reporting requirements that may apply.
- (14) Where the Rector has formed a reasonable suspicion that corrupt, fraudulent or improper conduct has occurred or may be occurring, they may either:
- undertake an appropriate investigation informed by the nature and seriousness of the alleged conduct. The Rector may utilise the services of an appropriate and suitably qualified independent person (internal or external) to investigate the substance of an allegation ('the investigation'); or
 - notify the Corruption Eradication Commission (KPK) in accordance with Law No. 30 of 2002 (as amended) particularly in circumstances where there are reasons why the University may not have the capacity or wish to conduct an investigation itself. In such cases, KPK may elect to undertake an investigation or it may refer the matter to another body (including back to the University) to investigate.
- (15) The investigation will be conducted in accordance with these principles:
- it must be conducted fairly, expeditiously and without bias;
 - the investigator must disclose any actual, perceived or potential conflicts of interest to the Rector as soon as they become aware of any such interest;
 - confidentiality must be maintained, information shared only on a 'need-to-know' basis and the Privacy policy must be applied and complied with when confidential or personal information is sought, used and/or disclosed;
 - all relevant parties to a matter will be given reasonable opportunity to be heard and all submissions considered;
 - a chain of evidence is to be maintained;
 - the investigator will provide a report to the Rector at the conclusion of the investigation that identifies whether fraud, corrupt or improper conduct has occurred and other policies and procedures may have been breached, including recommendations.
- (16) The Rector is responsible for:
- reporting any matter with a material effect on the University's integrity in a timely way to the Partner Universities and/or the Governing Board or the Audit and Risk Committee; and
 - actioning the University's response to any incident of fraud, including notifying relevant staff members so that appropriate disciplinary measures for students, staff and associates can be undertaken in accordance with the Staff Discipline procedure and Student Misconduct Procedure.
- (17) The DLI Finance function must maintain an Incident Register of all allegations/incidents and fraud investigations undertaken pursuant to this Procedure. This record shall at a minimum record the following:

- a. date and time that the report was made and by whom;
 - b. a description of the alleged incident, who was involved, where and when the incident occurred, an estimate of the impact;
 - c. action taken following discovery; and
 - d. results, conclusions and actions taken as a result of the investigation.
- (18) Where a staff member or a student of the University is involved in an incident of fraud, corruption or improper conduct in the course of their University engagement, the University may take appropriate disciplinary measures in accordance with the Staff Discipline procedure and Student Misconduct Procedure or other relevant policies.
- (19) The Rector (or delegate) will notify:
- a. the DLI Finance function of all allegations/incidents and fraud investigations undertaken pursuant to this Procedure; and
 - b. the Partner Universities if allegations of fraud and corruption have been substantiated. The partner universities will ensure that required agencies are notified.
- (20) If found to involve the misappropriation of money, stores or property, the Rector in consultation with the Partner Universities will report fraud, corrupt or improper conduct to the relevant Indonesian authorities in accordance with applicable laws and internal university policies. They may also report or refer a matter to the police or other relevant authorities or regulatory body.
- (21) The University may actively pursue the recovery of any money or property lost through fraud, corruption or improper conduct if there is a strong prospect of a net benefit to the University from such action, as determined by the Partner Universities on the recommendation of the Rector.

Responsibilities

- (22) The Rector will:
- a. have accountability and oversight of the University's internal control framework in respect of financial expenditure and the prevention and detection of fraud, corruption and improper conduct;
 - b. ensure that staff, associates and suppliers of the University and controlled entities are informed of the standard of conduct and responsibility required of them by the University, and as appropriate are provided with information, training and other resources;
 - c. ensure that all leaders undertake relevant induction and training as required and that the staff performance planning and review process clearly supports ethical behaviour, leadership and culture.
 - d. is responsible for the implementation of the policies approved by the Governing Board in relation to students, including in relation to the standard of conduct and responsibility required of them by the University, and will ensure that students are provided with information, training and other resources as appropriate including in relation to integrity matters.
- (23) The DLI Finance function will report to the Governing Board and the Audit and Risk Committee on how fraud and corrupt conduct risks are being managed throughout the University.
- (24) The Legal advisors are responsible for the review and monitoring of the effectiveness of the Integrity policy.

- (25) All DLI leaders will ensure that risk of fraudulent, corrupt and improper conduct are identified, assessed, mitigated and reviewed in accordance with the Risk Management Framework.
- (26) Leaders receiving a report of wrongdoing have a responsibility to:
- a. treat seriously all reports of wrongdoing, and
 - b. ensure all reports of wrongdoing are dealt with in accordance with the Fraud and Corruption Prevention and Control procedure or other appropriate process, noting that the University has a range of policies and procedures providing guidance to staff about the standards of conduct required of them, their responsibilities and accountabilities, including (but not limited to) the following:
 - i. Code of Conduct
 - ii. Integrity policy
 - iii. Gifts and Hospitality Acceptance procedure
 - iv. Business Expenses Policy
 - v. Credit card Policy
 - vi. Declaration of Interest procedure
 - vii. Employment of Staff Policy
 - viii. Contracts & Financial Delegations Policy
 - ix. Procurement policy and Procurement Procedure
 - x. Recruitment of Staff Procedure
 - xi. International Relations Regulation policy.
- (27) Staff will not discuss or report any suspected or proven instance of fraud, corrupt or improper conduct to the media, except with the prior written approval of the Partner Universities.

Section 6 - Definitions

- (28) For the purpose of this procedure:
- a. **Corruption:** dishonest activity in which a member of staff, student, controlled entity or associate of the University acts contrary to the interests of the University, knowingly or recklessly abuses their position of trust, and adversely affects the University's effective and honest performance or intends to do so in order to achieve personal gain or advantage for themselves or for another person or entity. Corruption can also involve corrupt conduct by the entity or a person purporting to act on behalf of and in the interests of the entity, in order to secure some form of improper advantage for the entity either directly or indirectly. Corruption does not occur unintentionally, or through mistaken actions.
 - b. **Detrimental action:** action causing injury, loss or damage, intimidation or harassment, discrimination, disadvantage or adverse treatment in relation to a person's employment, career, profession, trade or business, including the taking of disciplinary action.
 - c. **Fraud:** the act of dishonestly obtaining a material benefit by deception or other means. Fraud can include, for example, theft, deliberate falsification, concealment or misuse of documentation, or false representation. The University considers fraud an act of serious

misconduct and grounds for termination of employment, in accordance with the relevant workplace agreements.

- d. **Improper conduct:** dishonest or corrupt conduct by a public officer or body that constitutes a criminal offence, serious professional misconduct, dishonest performance of public functions or an intentional or reckless breach of public trust or misuse of information or material, or a substantial mismanagement of public resources or risk to the health or safety of persons, or a substantial risk to the environment, or conduct of any person that adversely affects or is intended to affect the honest performance by a public officer or public body of their functions as a public officer or public body and results in the person, or an associate of the person, obtaining an improper benefit.
- e. **Staff:** a member of the academic or professional staff, executive or honoraries appointed by the University.
- f. **Student:**
 - i. a person enrolled in a course or module in the University;
 - ii. a student of another higher education institution to whom the University grants rights of access to University premises and facilities;
 - iii. a candidate for an award of the University whose work has been examined or assessed but on whom the award has not been conferred;
 - iv. a person who is on leave of absence from or who has deferred enrolment in a module or program of the University.

ASSOCIATED DOCUMENTS

(29) Associated documents are available on the [DLI Policy page](#):

- Code of Conduct
- Integrity policy
- Gifts and Hospitality Acceptance procedure
- Declaration of Interest procedure
- Employment of Staff Policy
- Contracts & Financial Delegations Policy
- Procurement policy and Procurement Procedure
- Recruitment of Staff Procedure
- International Relations Regulation policy.
- Business Expenses Policy
- Credit card Policy
- Whistleblowing Policy

PROCEDURE DETAIL	
Name of procedure	Fraud and Corruption Prevention (DLI) Procedure
Overarching policy	Integrity (DLI) Policy
Approved by	Yayasan Governing Board
Approval date	14 December 2025
Date of effect	Upon publication
Date of review	To be reviewed within 12 months to confirm effectiveness.
DLI Approver	Joint Management Committee 12 December 2025
Responsible Executive	DLI Rector
Implementation Officer	DLI COO
Policy or procedure superseded	Not applicable
Associated documents	<ul style="list-style-type: none"> • Code of Conduct • Integrity policy • Gifts and Hospitality Acceptance procedure • Declaration of Interest procedure • Employment of Staff Policy • Contracts & Financial Delegations Policy • Procurement policy and Procurement Procedure • Recruitment of Staff Procedure • International Relations Regulation policy. • Business Expenses Policy • Credit card Policy • Whistleblowing Policy
Summary	This Procedure outlines the University's management of allegations of fraud and corrupt conduct and must be read in conjunction with the Integrity policy.
Key words for online searching	Bribery, Integrity, Compliance, Behaviour
Category	Governance
Target audience	Staff, associates