



Whistleblowing Policy

Whistleblowing_ HR _POL_V1.01

August 2024

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1. Introduction

The Mohamed bin Zayed University of Artificial Intelligence (“MBZUAI”) is committed to maintaining the highest standards of openness and accountability, and to responsibly conducting its operations. All MBZUAI employees are under an obligation to provide their services to the University with integrity, and may, in good faith, report suspected violations of any applicable law or regulation or University policies.

Individuals who report suspected violations shall not be intimidated, reprimanded, or retaliated against. False reporting may be subject to disciplinary action.

This document will provide detailed information on the policies about Whistleblowing within MBZUAI.

2. Objective

The objective of the Whistleblowing policy is:

- To provide a mechanism for employees and others to report suspicious activities and/or violations of policy, laws, and regulations.
- To provide guidelines for investigating suspected violations.
- To reinforce non-retaliation for any employee who in good faith voices concerns, seeks advice, files a complaint, and testifies or participates in investigations.

3. Scope

This policy applies to all categories listed under the definition of Whistleblower.

4. Whistleblowing policy

4.1 Purpose

4.1.1 The policy may be used to deal with specific concerns, specifically where an employee has a reasonable belief that one of the following has occurred or is likely to occur:

- Illegal or criminal activity
- Dishonest, fraudulent, or corrupt actions
- Failure to comply with legal obligations or breach of MBZUAI policies
- Financial or non-financial mal-administration, malpractice, impropriety, or fraud
- Academic or professional malpractice
- Abuse of authority
- Potential damage to MBZUAI, such as an unsafe environment, health risk, or abuse of property
- An act of injustice
- Attempts to suppress or conceal any information relating to any of the above.

This policy does not apply to personal grievances concerning an individual's terms and conditions of employment, other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters. Such complaints will be dealt with under the existing HR Policy and Code of Conduct.

If during the investigation any concern is raised about the above matters and it appears to the investigator to relate more appropriately to a grievance, bullying or harassment, or discipline, those procedures will be invoked, instead of or, where appropriate, in addition to this policy.

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4.2 Raising a Concern

4.2.1 Purpose

Any MBZUAI employee, contractor, outsourced employee, or visitor, who has a reasonable belief that there is malpractice related to the scope of the policy, may raise a concern under this policy. This concern may relate to another employee, group of employees, or a department or division. The University is committed to protecting the whistleblower from being penalized or retaliated against. However, if an employee makes a false accusation with malicious intent and without having reasonable grounds for believing the raised concern, they may be subject to disciplinary proceedings.

4.2.2 How to Report

- In some cases, the employee may raise a concern informally with their line manager in the first instance, in person, or writing. It may be possible to agree on a method of resolving the matter at this stage.
- MBZUAI expects that in most cases an individual will be able to raise any concern with their line manager or the second line manager if it is about the line manager. This can be done in person or in writing. It is hoped that this will result in finding a quick and effective resolution. In some cases, the line manager may feel that the concern should be referred to the Director of HR and Faculty Affairs or the General Counsel.
- Where the individual does not wish to raise the matter with their first or second-line manager or having raised the matter with the respective line manager, the individual feels that the concern has not been addressed, the individual should contact one of the following:

The Director of HR and Faculty Affairs or the General Counsel

- Upon receipt of a concern, the Whistleblower will be invited to a meeting with an HR and Faculty Affairs Representative to discuss the concern. The Whistleblower is expected to maintain the confidentiality of the concern raised and any subsequent investigation, recommendation, or action.
- Once the concern has been raised, the HR and Faculty Affairs Representative will carry out an initial assessment to determine the scope of any investigation. The Whistleblower may be required to attend additional meetings to provide further information to assist in making the initial assessment.
- The Whistle blower will be provided with a written summary of the concern raised and be indicated how the University proposes to deal with the matter.

4.3 Investigation

4.3.1 Review of Allegations:

The Assigned Representative will:

- Carry out a preliminary review of the disclosed concern and report it to the Director of HR and Faculty Affairs and the General Counsel
- The Director of HR and Faculty Affairs and the General Counsel, after consultation with the President, will determine whether the allegations raised should be investigated, as not all disclosures lead to investigations.
- If the decision is to move forward with an investigation, The Director of HR and Faculty Affairs and the General Counsel will determine if an internal investigation committee or an external authority should be involved (e.g., ADAA for financial violations).

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4.3.2 Investigation Process: Investigations will follow a fair process to be conducted promptly. The Representative, as appropriate, shall provide the whistleblower with feedback on the progress and expected timeframes of the investigation. Provided there are no restrictions for doing so, the person against whom an allegation has been made will be informed of the allegation and will have an opportunity to respond, in this case, the Whistleblower's identity shall remain anonymous.

4.3.3 Investigation Findings: The investigation may conclude with a report from the Representative, and it will include findings on the allegations and a summary of the evidence on which the findings are based, which will be submitted to the General Counsel. Any report will be the property of MBZUAI and will not be shared with the Whistleblower or any person against whom the allegations have been made.

The Internal Audit Department may be consulted on the reported concern at any stage of the investigation.

4.4 Non- Retaliation

4.4.1 Purpose

The University explicitly prohibits anyone to take any form of retaliation against a member of the MBZUAI community who, in good faith, raises a concern, seeks advice, files a complaint, or testifies in investigations. This is to encourage the reporting of any wrongdoing and to eliminate the fear of retaliation.

4.4.2 Procedure

- **Reporting Retaliatory Action:** Any employee who believes that they have been subject to retaliation should make a verbal or written report to any of the following:
 - 1st or 2nd line manager,
 - Director of HR and Faculty Affairs, or
 - General Counsel
- **Responding to Report:** If the receiving entity is not the HR and Faculty Affairs Department, the receiver should relay the report to the HR and Faculty Affairs Department
- **Investigation:** The HR and Faculty Affairs Department will investigate the matter by working with the alleged victim. The purpose of the investigation is to objectively ascertain what happened. All the details from the investigation will be shared on a need-to-know basis only to preserve confidentiality.
- **Consequences of violating this policy:** Anyone found guilty of retaliation shall be subject to disciplinary action. If the violator is not under the direct control of the University (contractors/visitors), they may face other types of consequences or restrictions.

4.5 External Disclosure

4.5.1 Purpose

In most cases, the member of staff should not find it necessary to alert anyone externally. However, for external disclosure, references to the internal MBZUAI Policies and Procedures should be followed, where applicable.

5. Definitions

Term	Definition
Whistleblowing	Raising a genuine concern relating to suspected or actual improper activities.

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Whistle-blower	A person making a protected disclosure is commonly referred to as a whistle-blower. Whistle-blowers may be University employees, applicants for employment, students, vendors, contractors, or the public. The whistle-blower’s role is as a reporting party. They are not investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.
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6. References and Related Documents

1. [HRA Laws and its Regulations](#)
2. [Code of Conduct- Staff and Faculty](#)

7. Document Control Information

Version number	File Name	Responsible Role	Comments	Date of change
V01.00	MBZUAI-HR-WB-POL-V1.0	Dir of HR		July 2022
V01.00	Whistleblowing_POL_V01.00	Dir of HR	Policy Sent to legal for approval and advised with no change	August 2024

Approval List

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Sequence Number	Sequence Roles	Responsible Role	Comments	Date
1	Policy Owner	Director of Human Research	Initiator	2022-05-11
2	IEQA Review	Head of IEQA	Reviewed	2022-05-25
3	Legal review	General Counsel	Reviewed	2024-08-28
4	Approver	The President	Approved	2022-05-25

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