

EMPLOYEE CODE OF CONDUCT		POLICY NUMBER: CUE-HR006
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THE CATHOLIC UNIVERSITY IN ERBIL

Employee Code Of Conduct

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I. DOCUMENT TYPE

☒ Policy

☐ Procedures

II. PURPOSE

The CUE's Code of Conduct sets forth the standards of behavior that CUE's staff and faculty are expected to adhere to. While CUE values freedom of expression and open communication, it is imperative that all employees comply with the articles of this Code of Conduct to ensure an ethical, respectful, and co-operative atmosphere conducive to the University's Mission. This Policy establishes a framework that encourages employees to conduct themselves with dignity and respect towards one another, the students, and the communities they engage with. Additionally, it aims to ensure transparency, promote accountability, and safeguard the University's professional reputation.

III. SCOPE

☒ University-Wide OR ☐ Departmental Specify Department(s):

This policy applies to all CUE employees (covering all employment categories, full and part-time, national and international, including, without limitation, administrative staff (staff) and faculty, consultants, and service contracts), interns, and volunteers.

IV. DEFINITIONS

Disciplinary Action - a formal action taken by the University to address violations, which may include verbal or written warnings, suspension, or termination of employment.

Violation - any act(s) or omission(s) by any person violating the University's policies, procedures, or ethical standards.

V. POLICY STATEMENT

It is crucial for both CUE and its employees to collaborate in order to create a work environment that fosters respect for all, including students, partners, and donors. CUE's Code of Conduct emphasizes the importance of maintaining respect for all individuals that the University collaborates with and serves. This policy is also designed to address misconduct and maintain a high standard of conduct within the University. The policy outlines the procedures for investigating and addressing misconduct, as well as the potential consequences for violations. The University strives to apply this policy fairly and consistently, while also promoting a culture of accountability and respect.

VI. CUE'S EXPECTATIONS

1. CUE expects every employee to represent the University through their conduct. Employees must demonstrate commitment to the University's vision, mission, core values, and goals by meeting this expectation; examples include, but are not limited to:
 - a) Commitment to the University & Ethical Conduct
 - i) Consistently follow the requirements outlined in CUE's Employee Handbook, as well as broader policies and procedures affecting daily work.
 - ii) Adhere to assigned responsibilities and refrain from exploiting or misusing any power or authority granted based on the designated role. This includes statutory, delegated, and administrative authorities.
 - iii) Avoid disseminating misleading information or engaging in deceptive declarations.
 - iv) Seek approval from a line manager before engaging in any contractual or agreement-related activities.
 - v) Refrain from generating any liability for CUE beyond the scope of one's authorization.

- b) Legal and Safety Compliance
 - i) Abide by national laws and refrain from engaging in any criminal activities or human rights violations.
 - ii) Comply with designated health and safety policies and procedures.
- c) Workplace Conduct and Performance
 - i) Adhere to the necessary attendance requirements, including reporting absences or late arrivals.
 - ii) Obtain prior approval, at least within thirty (30) minutes of the regular scheduled starting time (or as per local guidelines), if unable to work due to illness or an emergency.
 - iii) Maintain the expected level of dress and overall appearance in accordance with workplace standards.
 - iv) Adhere to predetermined performance standards and follow direct instructions.
- d) Inclusive Workplace Conduct
 - i) Maintain an attitude of treating others with dignity and respect.
 - ii) Use only respectful language when communicating, in any form, with employees, students, or guests of CUE. CUE firmly upholds a zero-tolerance policy towards discrimination, harassment, or any conduct or speech that is abusive, offensive, or unwelcome.
 - iii) Address and report to the HR Office any instances of inappropriate behavior or comments that exhibit discrimination, harassment, abuse, offensiveness, or unwelcomeness.
 - iv) Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
 - v) Actively seek insights from employees who possess diverse experiences, perspectives, and backgrounds.
 - vi) Refrain from using informal language or expressions that may not be easily translated across cultures.
 - vii) Support flexible work arrangements for co-workers with different needs, abilities, and/or obligations.
 - viii) Confront judgments or behaviors of individuals that are based on conscious or unconscious biases.
 - ix) Maintain an open mind and attentively listen to constructive feedback concerning how others perceive your behavior.
- e) Protection of University Resources
 - i) Care for CUE property, resources, assets, and funds, ensuring they are used solely for their intended purposes and not for any unauthorized activities.

VII. VIOLATIONS

1. While discipline for standard violations will follow a disciplinary procedure, the University reserves the right to implement discipline dependent on the gravity of the violation. Violations of any University policies or involving any of the below activities may subject the employee to disciplinary action, up to and including immediate termination of employment:
 - a) Failure to Demonstrate Commitment to the University & Ethical Misconduct
 - i) Failing to adhere to University policies, including the Employee Handbook and broader workplace procedures.
 - ii) Unacceptable personal conduct that violates any of CUE's policies or any known or written work rules. This conduct may occur on-duty or off-duty, so long as there is sufficient connection between the off-duty conduct and the employee's job.
 - iii) Violating national laws or engaging in criminal activities.

- iv) Failing to comply with designated health and safety policies.
- v) Engaging in actions that damage the University's reputation on or off campus.
- vi) Reporting false accusations that harm employees, students, or University morale.
- vii) Theft, fraud, embezzlement, or unauthorized possession of University, employee, or vendor property.
- viii) Falsifying employment applications, admissions applications, examination records, grades, or any University documentation.
- ix) Manipulating timekeeping records or fraudulently entering payment data.
- x) Providing false or misleading information to obtain employment or promotion.
- xi) Impersonating another person or submitting forged documents for personal gain.
- xii) Violating CUE's Conflict of Interest Policy such as by soliciting or accepting gifts, bribes, or favors in connection with University business. For more information, refer to the aforementioned policy.
- xiii) Committing any act, on or off the University's premises, which threatens or potentially threatens the reputation of the University or any of its employees, students, or vendors.
- xiv) Declining to reimburse any documented overpayment of compensation.
- b) Failure to Demonstrate Legal and Safety Compliance
 - i) Spreading malicious gossip, rumors, or defamatory statements that harm others' reputations.
 - ii) Negligence or careless action that results in endangering the safety of others.
 - iii) Engaging in disorderly or offensive conduct while on University premises.
 - iv) Refusing constructive feedback on workplace behavior.
 - v) Engaging in unauthorized employment elsewhere while receiving paid benefits for illness or during an extended absence.
 - vi) Offering assistance to any person (employee, student, visitor, volunteer, intern, or service provider) whom there is knowledge of or suspicion of implication in the perpetration of a crime or involved in activities that reach the threshold of criminal conduct.
- c) Workplace Conduct and Performance
 - i) Insubordination, referring to the act of refusing to follow legitimate instructions of a superior directly related to the performance of one's job.
 - ii) Failing to meet attendance requirements (e.g., unreported absences, excessive tardiness).
 - iii) Leaving work without permission or notifying a supervisor.
 - iv) Taking excessive breaks, sleeping, loitering, or loafing during work hours.
 - v) Smoking outside of designated areas or consuming food and beverages in restricted areas.
 - vi) Failing to maintain professional dress and appearance standards.
 - vii) Willfully restricting work output or interfering with others' job performance.
 - viii) Refusing work transfers when necessary under legal and university guidelines.
- d) Failure to Demonstrate Cohesive Workplace Conduct
 - i) Engaging in discrimination, which is the unjust or prejudicial treatment of different categories of people, especially on the grounds of ethnicity, age, sex, or disability.
 - ii) Engaging in harassment: any form of harassment is properly treated under CUE's Anti-Harassment Policy.
 - iii) Ignoring or failing to report incidents of discrimination, harassment, or abuse.
 - iv) Using informal language that may be misinterpreted across cultures.
 - v) Hindering teamwork or failing to support varied perspectives in the workplace.
- e) Failure to Protect and/or Abuse of University Resources

- i) Refusing to follow legitimate instructions from a supervisor.
- ii) Engaging in insubordination or disruptive workplace behavior.
- iii) Organizing or participating in non-university-sanctioned meetings without approval.
- iv) Declining to reimburse a documented overpayment of compensation.
- v) Unauthorized use of University property, including computers, documents, equipment, and funds. Inappropriate use of university resources may also be subject to special proceedings under the Conflict of Interest Policy.
- vi) Utilizing university tools, machines, or vehicles for personal reasons without permission. Inappropriate use of university resources may also be subject to special proceedings under the Conflict of Interest Policy.
- vii) Sharing, spreading, or posting unethical, outrageous, or inappropriate material.
- viii) Possessing unauthorized firearms, weapons, or explosives on campus.
- ix) Mismanagement of video management systems.
- x) Failing to comply with financial policies, internal controls, and procedural guidelines.

VIII. DISCIPLINARY ACTION

1. Violations Not Resulting in Immediate Termination

- a) For violations that do not result in immediate termination, CUE will perform one or more of the following actions, depending on the gravity of the violation:

- i) Verbal Warning

- 1) When a faculty or staff member's performance, conduct, or attendance becomes unsatisfactory or in violation of University policies, the line manager will initiate a verbal counseling session. During this meeting, the supervisor will clearly communicate the specific issues at hand, referencing concrete examples and evidence. The line manager will also outline the expected standards of performance or conduct, providing clear guidelines for improvement, aligning with the University's mission and values. To ensure a formal record of the discussion, the line manager will prepare written documentation (via email, using the appropriate template) within five (5) working days. This email will summarize the issues discussed (citing any policies or work rules, as applicable), the expectations set forth, and any agreed-upon corrective actions. It will be shared with the HR Office. The email will be filed by HR.

- ii) Written Warning

- 1) If the employee fails to address the issues raised in the verbal warning, a previous written warning, or if the employee's performance, conduct, or safety incident poses a large enough threat, a first or final written warning will be issued by HR, after communication with the line manager. This warning is a formal documentation of the performance, conduct, or attendance issues and their potential consequences. The line manager will meet with the employee to review any additional incidents or information related to the ongoing concerns. Management will outline the consequences for the employee's continued failure to meet performance or conduct expectations, which may include further disciplinary action up to and including termination. The written warning will be shared with and filed by HR.
- 2) A formal performance improvement plan will be issued within five (5) business days, requiring the faculty or staff member to take immediate and

sustained corrective action. The written warning may also include a statement indicating that the employee may be subject to additional discipline if they do not make significant improvements, aligning with the university's principles and standards. The improvement plan will be shared with and filed by HR to be followed by a final written warning up to termination for violation of the improvement plan. The improvement plan should be reviewed at thirty (30) working days after implementation.

iii) Suspension

- 1) In cases where the faculty or staff member's performance, conduct, or safety incident poses an immediate threat to the employee or others, or if the faculty or staff member does not address issues raised in the final written warning priorly given, the line manager may temporarily remove the employee from the workplace pending the results of an investigation. This suspension is considered a serious disciplinary action and is subject to approval from senior management and HR. Formal documentation of the suspension, via an official administrative order, must be issued within five (5) business days and shared with and filed by HR.
- 2) The length of the suspension will depend on the severity of the infraction and may be paid or unpaid, in full-day increments consistent with labor law regulations and local wage. If an investigation of the incident or infraction clears the employee of wrongdoing, their pay may be restored.

iv) Termination

- 1) The most severe disciplinary action is termination of employment. If the faculty or staff member fails to address issues raised in written warnings, if issues are not resolved following suspension, or if the nature of the offense warrants it, CUE may terminate a faculty or staff member. In some cases, termination may occur without prior notice or disciplinary action.
- 2) A formal recommendation by any line manager to terminate employment must be approved by HR and the Provost. The supervisor must email the recommendation to HR using the attached template; HR will then fill out a termination recommendation letter, which must be signed by the line manager, and forward it to the Provost. Final approval is required from the University President. Formal documentation of the termination must be issued within five (5) business days and shared with and filed by HR. HR is responsible for ensuring that a hard copy of the termination is personally given to the employee in question.

b) Violations Resulting in Immediate Termination

- i) Violations involving any of the below activities will result in immediate termination from employment, without exception:

1) Legal and Criminal Violations

- (a) Committing any misdemeanor or crime at work involving a co-worker, found guilty by a court in a final judgment.
- (b) Receiving a final court judgment sentencing the employee to imprisonment for more than one year.

2) Violence and Threats to Safety

- (a) Engaging in any physical altercation or act of violence against an employee, student, or guest on campus.
- (b) Carrying firearms or weapons on University premises or during university-related activities.
- (c) Endangering the personal safety of colleagues, students, or vendors.

- 3) Confidentiality
 - (a) Disclosing any confidential information about the University, its employees, students, or guests to non-CUE persons without written approval. Whistleblowing is considered a separate issue and is not grounds for immediate termination. It is properly treated in section XII of this policy.
- 4) Substance Abuse and Impairment
 - (a) Attending work under the influence of alcohol or illegal substances.
 - (b) Possessing, selling, or distributing alcohol or illegal substances on University premises. Note: for this violation, employees may face legal action in addition to disciplinary action.
 - (c) Abusing alcohol or illegal substances while representing the University or conducting university business.
- 5) Attendance and Work Commitments
 - (a) Being absent from work without justification for ten (10) consecutive days or twenty-two (22) non-consecutive days in a year (Iraqi Labor Law no. 71, 127/9).
 - (b) In cases of consecutive absences, failure to respond to a posted workplace warning within the first five (5) working days.
 - (c) In cases of non-consecutive absences, failure to acknowledge a written notice after fifteen (15) non-consecutive missed days.
- c) This list is not exhaustive; CUE reserves the right to disciplinary action of and/or termination of any employee for committing any other acts offensive to the integrity and mission of the University, even if not explicitly mentioned within this policy.
- d) Other Disciplinary Actions
 - i) Disciplinary action may also occur as fines or other measures, as appropriate to the circumstances. If the University property is damaged, then the employee will be required to pay restitution.

IX. SEXUAL HARASSMENT

1. Sexual harassment is defined as any unwanted non-verbal, verbal, or physical sexual interactions via any form of communication. Comments or compliments that are socially or culturally acceptable may be considered harassment. For more information on sexual harassment, refer to CUE's Anti-Harassment Policy.

X. COMPLAINTS, INVESTIGATION, & HEARING

1. CUE is obligated to examine and assess all claims of the aforementioned violations prior to deciding the type of disciplinary action to take against the accused employee.
 - a) Employee Disciplinary Committee Procedure
 - i) The Committee shall investigate the case and listen to all relevant parties and witnesses. The accused employee will have the chance to defend themselves and present their case. All facts will be carefully reviewed by the Committee, along with the employee's defense and any additional submitted documents.
 - ii) The Legal Affairs and HR will provide advice on the suitable disciplinary action(s). In case of the Committee members' disagreement on the action to be taken, the President will meet with the Committee to discuss the case.
 - iii) The employee will be informed of the decision; the official letter will be written by Legal Affairs in conformity with the Iraqi Labor Law. The timeline to inform the employee about the outcome is fifteen (15) working days from the date when the

investigation concluded and the Committee decision was reached. The final decision must be officially shared with the HR Office for record-keeping purposes.

XI. APPEALS

1. The employee holds the right to appeal the decision taken. They may submit the Disciplinary Appeal form to the HR Office within five (5) working days of receiving the notice of the disciplinary action. The HR Office must acknowledge receipt of the appeal and forward the appeal to the Provost within two (2) working days. Within ten (10) working days of receiving the appeal, the Provost must reconvene the Employee Disciplinary Committee to consider the appeal based on the following:
 - a) In case of having new evidence
 - b) Improper sanctions (either insufficient or excessive)
 - c) Error in procedures
 - d) Random or arbitrary decision
2. The Committee must officially inform the HR Office of its final decision within two (2) days of convening; the HR Office must then inform the employee of this decision within two (2) days of receiving the final decision.

XII. WHISTLEBLOWING

1. Communication of complaint
 - a) Whistleblowers play a crucial role in maintaining organizational integrity by helping identify and address misconduct. To support the grievance policy, CUE has established both physical drop boxes on campus and an online reporting system via its website for submitting reports.
 - b) The Employee Disciplinary Committee has been appointed to collect, review, and investigate submissions received through CUE's anonymous reporting channels. This system ensures protection for individuals who may fear retaliation for reporting concerns.
 - c) CUE encourages all members of the University community to utilize this anonymous reporting mechanism to promote transparency and accountability within the institution.
2. Communication with complainant
 - a) If anonymity is breached despite the above measures, the complainant will not be dismissed, demoted, suspended, threatened, harassed or otherwise discriminated against because of the communication of a genuine concern. Any employee of CUE who contravenes this policy when dealing with a complainant may be terminated. Similarly, any member of the management who violates this policy in his or her dealings with a complainant may have his or her relationship with CUE terminated.
 - b) A person is not required to prove the truth of an allegation but is required to act in good faith and provide sufficient evidence to the person contacted to demonstrate that there are sufficient grounds for concern. The number of contacts between the complainant and the investigative body will depend on the nature of the question and the clarity of the information provided. The investigating body may request additional information from the complainant.
 - c) All complaints will be treated in a confidential and sensitive manner. In addition, the complainant must be able to remain anonymous, except in cases where the nature of the disclosure and/or resulting investigation makes it necessary to disclose his or her identity (e.g. investigations or judicial proceedings). In such cases, all reasonable measures must be taken to protect the complainant from any prejudice resulting from a disclosure.
3. Investigation
 - a) All relevant cases, including suspicious but unproven cases, will be reviewed and analyzed by the Employee Disciplinary Committee. In some cases, this may involve an investigation

by a legal adviser. All investigations will be kept confidential to the extent possible. Appropriate corrective action will be taken, if necessary, and the findings will be communicated to the whistleblower and his or her line manager.

XIII. POLICY DEVELOPMENT AND AUTHORIZING PARTIES

1. Owned by: HR, May-11 2025
2. Reviewed by: Policy and Procedure Review Committee, May-11 2025
3. Approved by: President's Cabinet, Jul-15 2025
4. Approved by: Board of Trustees, **Date**
5. Adopted: **Date**

XIV. EMPLOYEE CONFIRMATION AND AGREEMENT

I, _____, the undersigned, confirm that I have read and agree to comply with this policy for the duration of my employment with the Catholic University in Erbil.

Name (print): _____

Name (sign): _____

Date: _____