



CODE OF CONDUCT AND ETHICS

1. Introduction

- 1.1 The purpose of this Code of Conduct and Ethics is to promote integrity, accountability, professionalism, transparency and ethical conduct among all employees of the Universities Fund (UF).
- 1.2 This Code shall apply to all employees, interns, consultants and persons engaged by the Fund in any capacity.
- 1.3 Every employee shall sign and commit to this Code upon appointment and shall be bound by any amendments made thereto.
- 1.4 The Code gives effect to Chapter Six of the Constitution and other applicable laws governing public officers.

2. Objectives

The objectives of this Code are to:

- a) Promote accountability, integrity, honesty and discipline.
- b) Ensure efficiency, transparency and professionalism in service delivery.
- c) Protect the integrity and reputation of the Fund
- d) Provide mechanisms for identifying and managing conflicts of interest.
- e) Promote ethical behaviour and public confidence in the Fund.
- f) Provide a framework for reporting misconduct and unethical conduct.

3. Core Values and Ethical Principles

Employees shall at all times uphold; integrity, accountability, transparency, professionalism, respect for human dignity, equity and fairness, inclusiveness and non-discrimination, rule of law, confidentiality and responsible stewardship of public resources.

4. Rule of Law

- 4.1 Employees shall perform their duties in accordance with the Constitution, applicable laws, regulations, policies and procedures
- 4.2 Employees shall respect and protect the rights and freedoms of all persons in the discharge of their duties.

5. Responsibility and Performance of Duties

Employees shall:

- a) Perform their duties efficiently, honestly and diligently.
- b) Carry out duties in a transparent and accountable manner.
- c) Maintain accurate records and documents relating to their work.
- d) Report to work on time and remain engaged in assigned duties.
- e) Not engage in private business during official working hours.
- f) Be responsible for reasonably foreseeable consequences arising from their decisions, actions or omissions.

6. Roles and Responsibilities

a) Management and Supervisors

Management and supervisors shall take all reasonable measures to promote integrity, discipline, compliance, accountability and devotion to duty among employees under their supervision.

b) Employees

Employees shall cooperate with supervisors and colleagues in the execution of their duties and comply with lawful instructions and policies of the Fund.

7. Professionalism

Employees shall:

- a) Conduct themselves in a manner that protects the integrity and reputation of the Fund.
- b) Treat colleagues, stakeholders and members of the public with courtesy, dignity and respect.
- c) Maintain appropriate standards of dress, grooming and personal hygiene.
- d) Ensure efficient, effective and economical use of resources entrusted to them.
- e) Observe any applicable professional and statutory codes of conduct.

8. Communication and Customer Service

Employees shall:

- a) Be courteous, responsive and willing to assist members of the public.
- b) Ensure official communication is respectful, professional and timely.
- c) Communicate clearly and effectively when discharging official duties.

- d) Conduct themselves professionally when dealing with stakeholders and resolving disputes.

9. Dress Code

Employees shall comply with the Fund's approved dress code policy and maintain a neat and professional appearance at all times. Any official dress-down arrangements approved by management shall be adhered to

10. Conduct of Private Affairs

Employees shall conduct their personal affairs in a manner that maintains public confidence in their integrity and that does not bring the Fund into disrepute.

11. Financial Integrity

- 11.1 Employees shall not use their office to unlawfully or improperly enrich themselves or any other person.
- 11.2 Employees shall not solicit or accept personal loans, benefits or financial arrangements that compromise their integrity or independence.
- 11.3 Employees shall live within their means and avoid financial commitments that may impair objective decision-making.

12. Tax, Financial and Legal Obligations

Employees shall:

- a) Comply with all tax obligations.
- b) Honour financial and legal obligations.
- c) Avoid conduct that exposes the Fund to reputational risk or legal liability.

13. Moral and Ethical Conduct

Employees shall:

- a) Be honest in all official dealings.
- b) Not abuse office.
- c) Present information truthfully and accurately.
- d) Not falsify records or documents.
- e) Not misuse public resources.

14. Working Hours and Attendance

The official working week consists of five (5) working days from Monday to Friday from 8.00 a.m. to 5.00 p.m. with a lunch break from 1.00 pm. to 2.00 p.m.; with a total official 40 working hours.

Employees shall:

- a) Report to work punctually.
- b) Obtain approval before absence from duty.
- c) Provide medical evidence when absent due to illness where required.
- d) Not leave the workplace during official hours without authorization.

15. Staff Identification

Employees shall wear official staff identification cards while on duty and within Fund premises.

16. Conflict of Interest

- 16.1 Employees shall avoid actual, potential or perceived conflicts between personal interests and official duties.
- 16.2 Employees shall immediately declare conflicts involving themselves, spouses, children, relatives, business associates or agents.
- 16.3 Declared conflicts shall be recorded in a Conflict-of-Interest Register maintained by the Fund.
- 16.4 An employee with a conflict shall not participate in discussions, evaluations, approvals or decisions relating to the matter.
- 16.5 No employee shall award or influence the award of a contract to themselves, a spouse, child, relative, business associate or agent.

17. Gifts, Hospitality, Benefits and Favours

- 17.1 Employees shall not solicit or accept gifts or favors that may influence or appear to influence official decisions.
- 17.2 Gifts received in an official capacity shall be deemed gifts to the Fund.
- 17.3 All gifts and hospitality received shall be declared and recorded in a Gifts Register.
- 17.4 The Fund shall manage gifts in accordance with applicable EACC guidelines and regulations.
- 17.5 Any gift exceeding the value prescribed by the Fund from time to time shall be surrendered to the Fund

18. Participation in Procurement and Tenders

- 18.1 No employee shall directly or indirectly participate in a tender for the supply of goods or services to the Fund.
- 18.2 Employees shall not use proxies, relatives, business associates or controlled entities to participate in Fund procurement opportunities.

19. Impartiality, Fairness and Non-Discrimination

Employees shall:

- a) Act impartially and objectively.
- b) Not practice favoritism, nepotism, tribalism, cronyism, religious bias or discrimination.
- c) Promote equal opportunity and fair treatment.

20. Bullying and Harassment

20.1 The Fund shall maintain a workplace free from bullying and harassment

20.2 Bullying includes intimidating, humiliating, malicious or offensive behaviour intended to undermine another person.

20.3 Bullying shall constitute misconduct and may result in disciplinary action.

21. Sexual Harassment

No employee shall engage in sexual harassment, including unwelcome advances, requests for favours, inappropriate physical contact, suggestive communications or offensive conduct of a sexual nature

22. Confidentiality and Official Information

22.1 Employees shall protect confidential information entrusted to them.

22.2 Employees shall not use official information for private benefit.

22.3 Confidentiality obligations shall extend to electronic records, emails, databases and digital communication platforms.

22.4 Employees handling sensitive information may be required to sign confidentiality declarations or oaths of secrecy in accordance with applicable laws and Fund policies.

22.5 No employee shall release, use or make official Fund documents the subject of external proceedings or disclosure without proper authority.

23. Care of Fund Property and Resources

Employees shall safeguard Fund assets, use resources only for authorized purposes, return Fund property upon separation and be accountable for loss or damage resulting from misuse or negligence

24. Political Neutrality

- a) Employees shall remain politically neutral and shall not use their office to advance political interests or publicly engage in political activities that compromise the impartiality of the Fund.

- b) Employees shall not seek appointments, promotions, transfers or benefits through political influence or external pressure.

25. Gainful Employment and External Engagements

Employees serving on a full-time basis shall not engage in gainful employment that conflicts with official duties, impairs objectivity or interferes with Fund responsibilities

26. Unauthorized Business Activities

Employees shall not engage in unauthorized trading, solicitation, marketing or private commercial transactions within Fund premises or during official working hours.

27. Money Lending and Related Activities

Employees shall not engage in money lending, loan brokerage or similar activities within Fund premises or in a manner that exploits colleagues or stakeholders.

28. Offers of Future Employment

Employees shall disclose in writing any offer of future employment or benefit that may create an actual or perceived conflict of interest.

29. Post-Employment Restrictions

Former employees shall not act for or represent another person in matters in which they were directly involved while serving in the Fund for a period of two years after separation where such involvement would create a conflict of interest.

30. Fundraising and Harambees

Employees shall comply with applicable laws governing fundraising and shall not use their office or workplace to solicit funds in a manner inconsistent with the Public Service Code of Conduct and Ethics.

31. Recruitment, Promotion and Human Resource Decisions

All recruitment, appointment, placement, training and promotion decisions shall be based on merit, competence, integrity, fairness and suitability.

32. Declaration of Income, Assets and Liabilities

Employees shall make declarations as required under the Public Officer Ethics Act and any other applicable law.

33. Employee Information Disclosure

Employees shall provide complete and accurate personal information and promptly update the Fund whenever material changes occur affecting employment records or statutory obligations.

34. Media Relations and Social Media

34.1 Only authorized officers shall communicate official Fund positions to the media.

34.2 Employees shall not make public statements on behalf of the Fund without authorization.

34.3 Employees shall use social media responsibly and shall not disclose confidential information or damage the reputation of the Fund.

35. Authorized Signatories

Only officers duly authorized by the Chief Executive Officer or through approved delegation instruments may sign official documents, commitments, contracts or correspondence on behalf of the Fund.

36. Acting Through Others

No employee shall cause, direct or permit another person to undertake conduct that would constitute a breach of this Code if performed by the employee.

37. Reporting Improper or Unlawful Orders

An employee who believes that an instruction or directive is unlawful, unethical or inconsistent with this Code shall report the matter through designated reporting channels without fear of retaliation.

38. Whistleblowing and Protection Against Retaliation

38.1 Any employee may report suspected misconduct, fraud, corruption, abuse of office or breaches of this Code.

38.2 Reports may be made confidentially through designated whistleblowing channels.

38.3 No employee shall suffer victimization or retaliation for making a report in good faith.

38.4 The Fund shall investigate all reported allegations promptly and fairly.

39. Complaints, Investigations and Enforcement

39.1 Complaints regarding breaches of this Code shall be recorded, investigated and determined in accordance with applicable laws and policies.

39.2 Employees shall be accorded due process and a fair hearing during investigations.

39.3 Matters disclosing criminal conduct may be referred to EACC, DCI, ODPP or other competent authorities.

40. Breach of the Code

Any breach of this Code shall constitute misconduct and may result in disciplinary action in accordance with applicable laws, regulations and Fund policies