

Ethics Policy in the Malaysian Educational Sector

An **Ethics Policy** in Malaysia's educational sector refers to a set of formal principles, guidelines, and codes of conduct that govern the moral and professional behaviour of all stakeholders in education — including teachers, administrators, and institutions. Here is a comprehensive overview:

1. The Core Framework: *Tatasusila Profesyen Keguruan* (Code of Ethics for the Teaching Profession)

The teaching ethics code (*Etika Keguruan*) in Malaysia was formulated in the 1970s and represents a set of behaviours and responsibilities of teachers toward students, parents, the community, the nation, and fellow colleagues. Every serving teacher is obligated to comply with and adhere to this code.

Ethics is defined as a set of rules designed to regulate and guide the behaviour of individuals, groups, or targets in performing their duties. Teachers bear a great responsibility to guide students toward comprehensive progress in life, and must adhere to the established teaching ethics to achieve that goal.

2. The Four Main Components

There are four main components of the professional ethics code in Malaysia that are closely related to the teaching career:

- ① **Responsibility Toward Students** The teacher shall give foremost consideration to the pupils' well-being, direct their entire professional effort to assist the pupil in developing their whole personality, foster in pupils honesty, integrity and consideration for others, and act with justice.
- ② **Responsibility Toward Parents** Teachers must maintain open, respectful communication with parents and guardians, and treat confidential information about students and families with discretion.
- ③ **Responsibility Toward Colleagues and the Profession** The code provides guidance on teachers' obligations in protecting student welfare, respecting confidential information, and emphasising the importance of cooperation — aiming to cultivate positive behaviour and improve the image of the teaching profession.
- ④ **Responsibility Toward Society and the Nation** Teachers must conduct themselves and carry out their responsibilities by taking into account the needs of the community and the nation, and must avoid spreading teachings that could be harmful.

3. Seven Core Values of the Ministry of Education

There are seven core values that form the focus of the work ethics of Malaysia's Ministry of Education. These values guide teachers in their professional conduct and are central to upholding the dignity of the profession. These typically include:

- **Amanah** (Trustworthiness)
 - **Berintegriti** (Integrity)
 - **Bertanggungjawab** (Responsibility)
 - **Berdedikasi** (Dedication)
 - **Inovatif** (Innovation)
 - **Profesional** (Professionalism)
 - **Patriotik** (Patriotism)
-

4. Ethics in Educational Administration and Leadership

As Malaysia continues to develop and modernise, addressing the ethical concerns faced by educational administrators, legislators, teachers and other stakeholders becomes increasingly crucial.

Research on ethical leadership in Malaysian schools has revealed key practices such as demonstration of friendly and trusting relationships, openness to school members, professional commitment, acting as a role model, and ensuring ethically appropriate conduct. These are considered important ethical leadership practices with implications for school policy and transformation.

5. Equity and Fairness as Ethical Principles

Policy makers are urged to consider factors such as socio-economic status and the type of schools when determining school funding allocation — suggesting the funding formula should not be based solely on student enrolment. This reflects the ethical principle of **equity** in the education system.

6. Emerging Area: AI Ethics in Education

Future research in Malaysia's education sector should prioritise ethical frameworks for AI use and scalable solutions for rural schools. Policymakers must invest in digital infrastructure and teacher training to ensure equitable AI integration, aligning with Malaysia's vision for an inclusive, AI-driven education system.

Summary Table

Domain	Key Ethical Obligation
Teachers → Students	Welfare, fairness, holistic development
Teachers → Parents	Communication, confidentiality
Teachers → Profession	Continuous improvement, integrity
Teachers → Society	National values, moral example
Administrators	Ethical leadership, equitable resource allocation
Institutions	AI ethics, inclusive policy, accountability

In essence, ethics policy in Malaysian education is a **multi-layered framework** anchored in the national teaching code, institutional governance, and broader social responsibility — all aimed at producing morally grounded educators and a just, high-quality education system.

Here's a summary of what's included in your BAC Education Group Ethics Policy 2025:

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The document is fully formatted with the Group's colour scheme (navy and blue), professional headers/footers, page numbers, and is structured across 5 Parts:

PART A — Preliminary

Preamble grounded in Malaysian law (PHEIA 1996, MQA Act, MACC Act, PDPA, Whistleblower Protection Act, etc.)

Vision, Mission & 8 Core Ethical Values

Scope covering all staff, students, management and third parties

Full definitions table and legislative framework

PART B — Ethical Standards

Detailed codes of ethics for Academic Staff, Non-Academic Staff, Students, and Management/Board

Academic Integrity (including AI-generated content policy)

Research Ethics and Conflict of Interest

PART C — Governance, Reporting & Enforcement

Group Ethics & Integrity Committee (GEIC) and Institutional Ethics Committees (IEC)

Whistleblowing channels and protections

Step-by-step investigation procedure with timelines

Disciplinary sanctions table and appeals process

PART D — Specific Policies

Anti-Bribery & Anti-Corruption (gifts register, facilitation payments)

Sexual Harassment & Dignity at Work

Data Privacy (PDPA-compliant)

Social Media & Technology Use

Environmental & Social Responsibility

PART E — SOPs & Forms (5 each)

SOP 1: Ethics Complaint Procedure

SOP 2: Conflict of Interest Disclosure Procedure

SOP 3: Academic Integrity Investigation Procedure

Form ECF-001: Ethics Complaint / Reporting Form

Form CIDF-002: Conflict of Interest Declaration Form

Form AIIR-003: Academic Integrity Incident Report

Form AECD-004: Annual Ethics Compliance Declaration

Form REAA-005: Research Ethics Approval Application

BAC EDUCATION GROUP

Brickfields Asia College | IACT College | Reliance College | Veritas University College | UNIMY

ETHICS POLICY

For Private Colleges and Private Universities in Malaysia

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Copy No.	Institution	Copy Holder	Date Issued
1	BAC Education Group (Group Level)	Group Chief Executive Officer	
2	Brickfields Asia College	Principal / Chief Executive	
3	IACT College	Principal / Chief Executive	
4	Reliance College	Principal / Chief Executive	
5	Veritas University College	Vice Chancellor / President	
6	UNIMY	Vice Chancellor / President	

TABLE OF CONTENTS

PART A: PRELIMINARY

1. Preamble and Introduction	4
2. Vision, Mission and Core Values	5
3. Scope and Application	5
4. Definitions	6
5. Legislative and Regulatory Framework	7

PART B: ETHICAL STANDARDS AND OBLIGATIONS

6. Code of Ethics for Academic Staff	8
7. Code of Ethics for Non-Academic Staff	10
8. Code of Ethics for Students	11
9. Code of Ethics for Management and Leadership	12
10. Academic Integrity	13
11. Research Ethics	14
12. Conflict of Interest	15

PART C: GOVERNANCE, REPORTING AND ENFORCEMENT

13. Ethics Governance Structure	16
14. Reporting Mechanism and Whistleblowing	17
15. Investigation Procedures	17
16. Disciplinary Action and Sanctions	18
17. Protection Against Victimisation	19

PART D: SPECIFIC POLICIES

18. Anti-Bribery and Anti-Corruption	19
19. Sexual Harassment and Dignity at Work	20
20. Data Privacy and Confidentiality	21
21. Use of Technology and Social Media	21
22. Environmental and Social Responsibility	22

PART E: FORMS AND SOPs

SOP 1: Ethics Complaint / Reporting Procedure	23
SOP 2: Conflict of Interest Disclosure Procedure	24
SOP 3: Academic Integrity Investigation Procedure	25
FORM 1: Ethics Complaint / Reporting Form (ECF-001)	26
FORM 2: Conflict of Interest Declaration Form (CIDF-002)	28
FORM 3: Academic Integrity Incident Report (AIIR-003)	29
FORM 4: Annual Ethics Compliance Declaration (AECD-004)	30
FORM 5: Research Ethics Approval Application (REAA-005)	31

PART A: PRELIMINARY

1. PREAMBLE AND INTRODUCTION

BAC Education Group (the 'Group') comprises five distinguished higher education institutions: Brickfields Asia College, IACT College, Reliance College, Veritas University College, and UNIMY (the University of Malaysia International Youth). Together, these institutions serve thousands of students and employ hundreds of staff across Malaysia.

The Group is committed to upholding the highest standards of ethical conduct, academic integrity, professional responsibility and good governance in all its activities. This Ethics Policy ('Policy') establishes a comprehensive framework of ethical standards, obligations and processes that apply across the Group.

This Policy is grounded in and consistent with:

- The National Education Philosophy (Falsafah Pendidikan Kebangsaan) of Malaysia
- The Malaysian Teachers' Code of Ethics (Tatasusila Profesyen Keguruan)
- The Malaysian Anti-Corruption Commission Act 2009 (MACC Act)
- The Malaysian Code on Corporate Governance (MCCG)
- The Private Higher Educational Institutions Act 1996 (PHEIA 1996) and its amendments
- The Malaysian Qualifications Agency Act 2007 (MQA Act)
- The Personal Data Protection Act 2010 (PDPA)
- The Employment Act 1955 (and its amendments)

This Policy applies to all private colleges and private universities within the Group and is designed to fulfil the ethical standards required by the Ministry of Higher Education Malaysia (MOHE) and the Malaysian Qualifications Agency (MQA).

2. VISION, MISSION AND CORE ETHICAL VALUES

2.1 Vision

To be a leading education group in Malaysia that is recognised for excellence, integrity, and positive social impact.

2.2 Mission

To provide quality education in a safe, ethical, inclusive, and professionally managed environment, nurturing individuals who are competent, responsible and of strong moral character.

2.3 Core Ethical Values (BAC GROUP-ETHICS)

Value	Description
Amanah (Trustworthiness)	Honesty and reliability in all dealings with students, staff, regulators and the public.
Integriti (Integrity)	Adherence to moral and ethical principles; soundness of character.
Tanggungjawab (Responsibility)	Accountability for one's actions and decisions.
Hormat (Respect)	Treating all individuals with dignity and fairness regardless of background.
Kecemerlangan (Excellence)	Commitment to the highest standards of academic and professional quality.
Keadilan (Justice)	Fair, impartial and equitable treatment of all stakeholders.
Inovasi (Innovation)	Encouraging ethical creativity and continuous improvement.
Patriotisme (Patriotism)	Contributing positively to the development of Malaysia and its society.

3. SCOPE AND APPLICATION

This Policy applies, without exception, to:

- All permanent, contract, part-time and adjunct academic staff
- All non-academic, administrative and support staff
- All management and leadership personnel including Board members and Council members
- All full-time, part-time and online students enrolled in any programme
- All third-party contractors, vendors, consultants and agents acting on behalf of the Group
- All alumni in their dealings with the institution

This Policy applies at all Group campuses, off-campus activities, online/virtual environments, research settings, and any other location where institutional activities are conducted.

Where specific institutions have additional requirements under their respective charters, instruments of incorporation, or regulatory approvals, those requirements shall be read together with this Policy. In the event of conflict, the stricter standard shall prevail.

4. DEFINITIONS

Term	Definition
Group	BAC Education Group, comprising Brickfields Asia College, IACT College, Reliance College, Veritas University College and UNIMY.
Institution	Any one of the colleges or universities within the Group.
Staff	Any person employed by the Group or any Institution, whether full-time, part-time, contract or temporary.
Student	Any person enrolled in any academic programme offered by any Institution within the Group.
Academic Staff	Lecturers, tutors, professors, associate professors, senior lecturers and all persons engaged in teaching and/or research.
Management	The Board of Directors, Senate, Academic Board, Committees and senior officers responsible for governance and administration.
Ethics Committee	The committee established at Group and institutional levels responsible for administering this Policy.
Misconduct	Any act or omission that contravenes the standards set out in this Policy or applicable law.
Whistleblower	A person who reports in good faith a suspected breach of ethics or misconduct.
Conflict of Interest	A situation where a personal interest may improperly influence the performance of official duties.
Academic Integrity	The commitment to the fundamental values of honesty, trust, fairness, respect, responsibility and courage in all academic work.
MOHE	Ministry of Higher Education Malaysia (Kementerian Pendidikan Tinggi).
MQA	Malaysian Qualifications Agency (Agensi Kelayakan Malaysia).
PHEIA	Private Higher Educational Institutions Act 1996.

5. LEGISLATIVE AND REGULATORY FRAMEWORK

This Policy is anchored in the following Malaysian laws, regulations and guidelines:

Legislation / Guideline	Relevance to this Policy
Private Higher Educational Institutions Act 1996 (Act 555) & Amendments	Regulatory framework for private colleges and universities, including governance, staff conduct and student affairs.
Malaysian Qualifications Agency Act 2007 (Act 679)	Standards for academic quality, institutional accountability, programme conduct and ethical research.
Education Act 1996 (Act 550)	General education framework and obligations of educational institutions.
Employment Act 1955 (Act 265)	Employment terms, disciplinary procedures and employee rights.
Malaysian Anti-Corruption Commission Act 2009 (Act 694)	Anti-bribery and anti-corruption obligations for all persons.
Personal Data Protection Act 2010 (Act 709)	Protection of personal data of students, staff and third parties.
Whistleblower Protection Act 2010 (Act 711)	Protection for individuals reporting wrongdoing in good faith.
Communications and Multimedia Act 1998 (Act 588)	Ethical use of digital platforms and online communications.
National Education Philosophy 1988 (Falsafah Pendidikan Kebangsaan)	Foundational philosophy guiding the values and purpose of education in Malaysia.
Code of Ethics for the Teaching Profession (Tatasusila Profesyen Keguruan)	Ethical obligations of teachers and academic educators.
Malaysian Code on Corporate Governance 2021 (MCCG 2021)	Governance standards for organisations in Malaysia.
MQA Code of Practice for Programme Accreditation (COPPA 2.0)	Standards for academic integrity and institutional responsibility.

PART B: ETHICAL STANDARDS AND OBLIGATIONS

6. CODE OF ETHICS FOR ACADEMIC STAFF

6.1 Responsibilities Toward Students

Every academic staff member shall:

1. Give foremost consideration to the welfare, safety, wellbeing and holistic development of every student in their care.
2. Direct their full professional effort to assist students in developing intellectually, emotionally, physically and morally.
3. Foster in students the values of honesty, integrity, respect for diversity, critical thinking and responsibility.
4. Act at all times with fairness and without discrimination on grounds of race, religion, gender, nationality, disability, socio-economic status or political affiliation.
5. Respect the confidentiality of student information and academic records.
6. Never exploit, abuse or misuse the teacher-student relationship for personal, financial or sexual gain.
7. Maintain appropriate professional boundaries with students at all times, including in digital and online interactions.

6.2 Responsibilities Toward the Profession

Every academic staff member shall:

1. Maintain and continuously improve their professional knowledge, skills and competencies.
2. Conduct themselves in a manner that upholds the dignity and prestige of the teaching profession.
3. Not engage in activities that bring the profession or the Institution into disrepute.
4. Acknowledge the intellectual contributions of others and avoid all forms of plagiarism.
5. Declare and manage conflicts of interest in accordance with Section 12 of this Policy.
6. Comply with all applicable professional codes issued by relevant professional bodies.

6.3 Responsibilities Toward Colleagues

1. Treat all colleagues with respect, professionalism and courtesy.
2. Refrain from harassment, bullying, discrimination or any behaviour that creates a hostile work environment.
3. Support the professional development of colleagues and juniors.
4. Not undermine the professional reputation of colleagues through malicious gossip, false allegations or sabotage.

6.4 Responsibilities Toward Parents, Community and Nation

1. Communicate honestly and respectfully with parents and guardians regarding student progress and welfare.
2. Uphold the values of the National Education Philosophy (Falsafah Pendidikan Kebangsaan).
3. Contribute positively to the community and to national development.
4. Avoid spreading teachings, materials or views that are subversive, seditious or harmful to national unity.

6.5 Assessment and Grading Ethics

1. Assess student work objectively, consistently and in accordance with the approved assessment criteria.
2. Not accept gifts, favours or inducements in connection with grading or assessment.
3. Declare any personal relationship with a student that could compromise objectivity in assessment.
4. Maintain the security and confidentiality of examination papers and assessment materials.

7. CODE OF ETHICS FOR NON-ACADEMIC STAFF

7.1 Core Obligations

All non-academic and support staff shall:

1. Perform their duties diligently, professionally and with integrity.
2. Treat all students, staff and visitors with courtesy, fairness and respect.
3. Maintain strict confidentiality regarding institutional and personal information accessed in the course of their duties.
4. Use institutional resources, including IT systems, only for authorised purposes.
5. Not solicit or accept bribes, gifts or corrupt gratification from any party.
6. Disclose and manage all conflicts of interest in accordance with this Policy.
7. Report suspected misconduct, fraud or unethical behaviour through the appropriate channels.

7.2 Admissions and Enrolment Staff

Staff involved in student admissions shall, additionally:

- Ensure all admissions decisions are based solely on merit, prescribed requirements and institutional policy.
- Never accept payment, gifts or favours in exchange for preferential treatment in admissions.
- Provide accurate and truthful information to prospective students and parents.
- Respect the privacy of applicant information.

7.3 Finance and Procurement Staff

Staff involved in financial management and procurement shall:

- Comply with all applicable financial regulations and institutional financial policies.
- Never falsify financial records, invoices, receipts or reports.
- Ensure procurement processes are transparent, competitive and free from favouritism.
- Declare all interests in vendors, suppliers or contractors.

8. CODE OF ETHICS FOR STUDENTS

8.1 Academic Conduct

All students enrolled at any Institution within the Group shall:

1. Conduct all academic work honestly and with integrity — free from plagiarism, cheating, fabrication, falsification and collusion.
2. Submit only their own work, unless collaboration is expressly permitted by the academic staff.
3. Properly cite and acknowledge all sources used in academic work.
4. Not impersonate another student or allow another to impersonate them in any academic activity.
5. Not access, tamper with or share confidential examination or assessment materials.

8.2 Behaviour and Conduct

1. Treat all members of the institutional community — staff, fellow students and visitors — with dignity and respect.
2. Refrain from any form of harassment, bullying, intimidation, discrimination or violence.
3. Behave responsibly both on and off campus, including in online and social media environments.
4. Not engage in activities that endanger themselves or others, or that bring the Institution into disrepute.
5. Comply with all institutional regulations, codes and policies.

8.3 Use of Institutional Resources

1. Use institutional facilities, equipment, IT systems and library resources responsibly and only for authorised purposes.
2. Not damage, destroy or misappropriate institutional property.
3. Respect the intellectual property rights of others and of the Institution.

8.4 Community Responsibilities

1. Participate constructively in student activities and community initiatives.
2. Report unethical behaviour by peers through the appropriate channels.
3. Act as ambassadors of the Institution in the wider community.

9. CODE OF ETHICS FOR MANAGEMENT AND LEADERSHIP

9.1 Board of Directors / Board of Governors

1. Exercise oversight of the Institution in the best interests of students, staff, stakeholders and society.
2. Make decisions transparently, fairly and in accordance with applicable law and this Policy.
3. Declare and abstain from voting on matters in which they have a personal interest.
4. Not use their position for personal gain or to benefit related parties improperly.

9.2 Senior Management (Vice Chancellor, Principal, Chief Executive and equivalent)

1. Lead by example and model the ethical values set out in this Policy.
2. Create and maintain a culture of ethical conduct and integrity throughout the Institution.
3. Ensure that this Policy is communicated, understood and enforced at all levels.
4. Act decisively and fairly in responding to reports of misconduct or unethical behaviour.
5. Ensure adequate resources are allocated to ethics governance and training.

9.3 Heads of Department / Programme Coordinators

1. Monitor compliance with this Policy within their departments and programmes.
2. Address minor breaches at the departmental level in accordance with institutional procedures.
3. Ensure that staff under their supervision receive ethics orientation and training.
4. Report significant breaches to the Ethics Committee promptly.

10. ACADEMIC INTEGRITY

10.1 Definition and Scope

Academic integrity means a commitment to honesty, trust, fairness, respect, responsibility and courage in all academic endeavours. All forms of academic dishonesty are strictly prohibited, including:

Type of Breach	Definition / Examples
Plagiarism	Presenting another person's work, words, ideas or data as one's own without proper attribution, whether from print, digital or AI sources.
Cheating	Using unauthorised materials, assistance or means in examinations or assessments.
Fabrication	Inventing or falsifying data, results, citations or other information in any academic submission.
Falsification	Manipulating research materials, equipment, processes or data so as to misrepresent results.
Collusion	Collaborating with others without authorisation in completing assessed work intended to be individual.
Contract Cheating	Commissioning or submitting work prepared by a third party, including AI tools, in violation of assessment rules.
Impersonation	Sitting an examination or completing assessed work on behalf of another student, or vice versa.
Self-Plagiarism	Re-submitting substantially similar work for which academic credit has already been obtained, without disclosure.

10.2 AI-Generated Content

The use of artificial intelligence (AI) tools in academic work shall be governed by the specific assessment guidelines published by each academic department. Undisclosed or unauthorised use of AI-generated content shall be treated as academic misconduct in accordance with this Policy.

10.3 Responsibilities

Academic staff are responsible for designing assessments that promote academic integrity, using approved plagiarism detection tools, and reporting suspected breaches promptly. Students are responsible for understanding the rules before submission. Institutions are responsible for providing clear guidance and supporting a culture of academic honesty.

11. RESEARCH ETHICS

11.1 Principles of Ethical Research

All research conducted under the auspices of any Institution within the Group shall adhere to the following principles:

- Respect for persons — honouring the autonomy and dignity of all research participants.
- Beneficence — maximising benefits and minimising harms.
- Justice — ensuring fair distribution of the burdens and benefits of research.
- Integrity — honest conduct in all aspects of research design, execution, analysis and reporting.
- Transparency — openness about methods, data sources, funding and conflicts of interest.

11.2 Research Ethics Review

All research involving human participants, animals, biological materials, or sensitive data shall obtain prior approval from the Institutional Research Ethics Committee (IREC) before commencement, using Form REAA-005 (attached at Appendix E of this Policy).

11.3 Prohibited Research Conduct

- Fabrication, falsification or selective reporting of research data.
- Failure to obtain informed consent from research participants.
- Research that endangers participants, staff or the public.
- Plagiarism in research publications or presentations.
- Ghost writing and honorary authorship.
- Failure to disclose funding sources or conflicts of interest.

12. CONFLICT OF INTEREST

12.1 Definition

A conflict of interest arises when a person's private or personal interests could improperly influence — or appear to influence — the exercise of their official duties, responsibilities or judgement.

12.2 Examples of Conflicts of Interest

- Participating in a procurement decision where one has a financial interest in a supplier.
- Supervising or assessing a student who is a family member or close associate.
- Accepting gifts, hospitality or other benefits from vendors or students.
- Holding an outside employment or directorship that competes with or conflicts with duties.
- Using institutional resources, information or relationships for private benefit.

12.3 Disclosure and Management

1. All staff and management shall promptly disclose any actual, potential or perceived conflict of interest using Form CIDF-002.
2. Upon disclosure, the Ethics Committee or designated officer shall assess the situation and determine appropriate management measures.
3. Where a conflict cannot be adequately managed, the person concerned shall be required to recuse themselves from the relevant matter.
4. Failure to disclose a known conflict of interest constitutes a serious breach of this Policy.
5. Annual declarations of interest shall be completed by all staff in management and oversight roles.

PART C: GOVERNANCE, REPORTING AND ENFORCEMENT

13. ETHICS GOVERNANCE STRUCTURE

13.1 Group Ethics and Integrity Committee (GEIC)

The Board of Directors of BAC Education Group shall establish a Group Ethics and Integrity Committee (GEIC) with the following composition and responsibilities:

Position	Role in GEIC
Group Chief Executive Officer or nominee	Chairperson
Head of Group Legal / Compliance	Secretary
Head of Group Human Resources	Member
Head of Group Academic Affairs	Member
Head of Group Student Affairs	Member
Independent Non-Executive Member (external appointment)	Member
Institutional Representatives (one per institution, rotating)	Members

The GEIC shall meet at least twice per year and shall be responsible for:

- Overseeing the implementation and review of this Policy across all institutions.
- Receiving and reviewing reports from Institutional Ethics Committees.
- Determining appropriate sanctions for serious or Group-level misconduct.
- Reporting on ethics and integrity matters to the Board of Directors.

13.2 Institutional Ethics Committee (IEC)

Each Institution within the Group shall establish its own Institutional Ethics Committee (IEC) comprising:

- Principal / Vice Chancellor / Chief Executive (Chairperson)
- Head of Academic Affairs (Member)
- Head of Student Affairs (Member)
- Head of Human Resources (Member)
- Legal Advisor or Compliance Officer (Secretary)
- Two (2) elected academic staff representatives (Members)
- One (1) student representative — for matters involving student conduct (Member)

The IEC shall be responsible for receiving, investigating and resolving ethics complaints at the institutional level, subject to escalation to the GEIC for serious matters.

14. REPORTING MECHANISM AND WHISTLEBLOWING

14.1 How to Make a Report

Any person who witnesses, suspects or becomes aware of a breach of this Policy may report it through the following channels:

Channel	Contact / Details
In-person / Written Report	Submit Form ECF-001 to the Institutional Ethics Committee Secretary or Group Compliance Office.
Email (Institutional)	ethics@[institution].edu.my (dedicated ethics email for each institution).
Group Ethics Hotline	ethics@baceducation.edu.my (Group level, monitored by GEIC Secretary).
Anonymous Reporting	Via the Group anonymous online reporting portal or drop box at each campus.

14.2 Whistleblower Protections

The Group is committed to protecting all persons who make reports in good faith. In accordance with the Whistleblower Protection Act 2010 (Act 711):

- No person shall be subject to retaliation, victimisation, disciplinary action or any detriment for making a bona fide report.
- The identity of the reporting person shall be kept confidential to the extent possible.
- Any person found to have victimised a whistleblower shall be subject to disciplinary action.
- Knowingly making a false or malicious report is a breach of this Policy.

15. INVESTIGATION PROCEDURES

Upon receipt of a report, the following steps shall be taken:

Step	Action	Responsible Party	Timeline
1	Acknowledge receipt of the complaint to the complainant (if not anonymous).	IEC Secretary	Within 3 working days
2	Conduct preliminary assessment to determine if the complaint is within scope and prima facie founded.	IEC Chairperson	Within 5 working days
3	If prima facie case established, formally initiate investigation and notify the respondent.	IEC Chairperson	Within 7 working days
4	Appoint an Investigation Panel (minimum 3 members, independent of the matter).	IEC Chairperson	Within 10 working days
5	Investigation Panel gathers evidence, interviews witnesses and respondent, and prepares report.	Investigation Panel	Within 30 working days
6	IEC reviews Investigation Panel report and makes determination of facts.	IEC	Within 10 working days of receiving panel report
7	IEC recommends appropriate sanction or action to the relevant authority.	IEC	Together with Step 6
8	Final decision communicated to all relevant parties. Right of appeal noted.	IEC Chairperson / GEIC	Within 5 working days of decision

Principles of natural justice shall be applied throughout the investigation. The respondent shall be given a fair opportunity to present their case. Investigations shall be conducted confidentially. Timelines may be extended for complex matters with appropriate notification.

16. DISCIPLINARY ACTION AND SANCTIONS

16.1 Range of Sanctions

Following a finding of misconduct, the following sanctions may be imposed, having regard to the severity of the breach, the circumstances and any mitigating factors:

Category	Nature of Breach	Possible Sanctions
Minor	First or isolated breach; limited impact; no ill intent.	Verbal warning; written warning; mandatory ethics training.
Moderate	Repeated minor breaches; deliberate but not egregious breach; moderate harm.	Written reprimand; suspension of duties/privileges; demotion; loss of increment; probation.
Serious	Deliberate, significant or repeated breach; substantial harm; fraud, corruption, harassment.	Suspension without pay; termination of employment / enrolment; debarment; referral to authorities.
Very Serious	Criminal conduct; severe harm to persons; fraud involving large sums; gross academic misconduct.	Immediate dismissal; referral to relevant authorities (MACC, Police); notation on academic/employment record.

16.2 Students

In addition to the above, sanctions applicable to students may include: academic penalty (zero mark, fail grade); suspension from examinations; suspension from the Institution; cancellation of enrolment; withdrawal of academic award; and notation on academic transcript.

16.3 Right of Appeal

Any person subject to a disciplinary sanction has the right to appeal in writing to the GEIC within fourteen (14) calendar days of receiving the decision. The GEIC shall constitute an independent Appeal Panel whose decision shall be final and binding.

17. PROTECTION AGAINST VICTIMISATION

The Group expressly prohibits any form of retaliation, victimisation or detrimental treatment against:

- A person who has reported a suspected breach of this Policy in good faith.
- A person who has participated as a witness in an investigation under this Policy.
- A person who has exercised any right under this Policy.

Any conduct amounting to victimisation shall itself constitute a serious breach of this Policy and shall be dealt with through disciplinary proceedings.

PART D: SPECIFIC POLICIES

18. ANTI-BRIBERY AND ANTI-CORRUPTION

18.1 Zero Tolerance

The Group operates a zero-tolerance policy against all forms of bribery and corruption. No staff member, management personnel, student, contractor or agent shall offer, give, request or receive any bribe, corrupt payment or improper advantage, directly or indirectly, in connection with any business or matter involving the Group.

18.2 Gifts, Hospitality and Entertainment

Category	Policy
Token gifts (value ≤ RM100)	May be accepted; must be declared to the Head of Department.
Gifts (value > RM100)	Must be declined or surrendered to the Institution; recorded in the Gifts Register.
Cash gifts of any amount	Must be declined in all circumstances.
Gifts from students	Academic staff shall decline gifts from current students during a teaching/assessment period.
Corporate hospitality	Modest and infrequent; must not create an obligation; prior approval required if value > RM200.

18.3 Facilitation Payments

Facilitation payments (small payments made to expedite routine government actions) are prohibited. Any demand for such payments must be reported immediately to the Group Compliance Office.

19. SEXUAL HARASSMENT AND DIGNITY AT WORK

19.1 Policy Statement

The Group is committed to maintaining a work and study environment free from sexual harassment and all forms of harassment, bullying and intimidation. All persons at any Institution are entitled to be treated with dignity and respect.

19.2 Definition

Sexual harassment means any unwanted conduct of a sexual nature (whether verbal, non-verbal, physical or visual) that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. This includes but is not limited to: unwelcome sexual advances; requests for sexual favours; sexual comments, jokes or innuendo; and transmission of sexually explicit materials.

19.3 Obligations and Reporting

- All staff and students must report incidents of sexual harassment.
- Complaints shall be handled with sensitivity, urgency and strict confidentiality.
- The Institution shall provide support services to complainants.
- Substantiated sexual harassment is a serious breach and shall result in disciplinary action up to and including dismissal.
- Sexual harassment involving a minor shall be reported to the relevant authorities.

20. DATA PRIVACY AND CONFIDENTIALITY

20.1 Obligations under the Personal Data Protection Act 2010

All Institutions within the Group are data users under the Personal Data Protection Act 2010 (PDPA). All staff handling personal data of students, staff or third parties shall:

- Collect only personal data that is necessary for a legitimate institutional purpose.
- Not disclose personal data to unauthorised parties.
- Implement reasonable technical and organisational security measures to protect personal data.
- Retain personal data only for as long as necessary and dispose of it securely.
- Comply with requests from data subjects to access or correct their personal data.

20.2 Confidential Information

Staff must maintain the confidentiality of institutional strategies, financial data, legal matters, student records, staff personnel files and any other information designated as confidential. This obligation continues after the termination of employment.

21. USE OF TECHNOLOGY AND SOCIAL MEDIA

21.1 Acceptable Use

Institutional IT systems (computers, networks, email, online platforms) are provided for legitimate academic and administrative purposes. Incidental personal use is permitted where it does not interfere with duties, consume significant resources or breach any law or institutional policy.

21.2 Prohibited Conduct — Technology

- Accessing, downloading or distributing illegal, obscene or harmful content.
- Attempting to circumvent IT security measures or access unauthorised systems.
- Using institutional IT resources for personal commercial activities.
- Installing unauthorised software.
- Sharing login credentials.

21.3 Social Media

All staff and students shall exercise responsibility in their use of social media. When posting content that relates to the Institution, colleagues, students or any institutional matter, they shall:

- Not make defamatory, discriminatory or harassing statements about any person.
- Not disclose confidential or sensitive institutional information.
- Not impersonate the Institution or make unauthorised statements on its behalf.
- Be aware that online conduct can constitute misconduct under this Policy.

22. ENVIRONMENTAL AND SOCIAL RESPONSIBILITY

The Group is committed to sustainable and socially responsible operations. All staff, students and stakeholders are encouraged to:

- Minimise waste and energy consumption in campus operations.
- Respect and protect the environment in all institutional activities.
- Support community engagement, volunteerism and outreach programmes.
- Promote inclusive and respectful campus cultures that celebrate diversity.
- Ensure procurement and supply chain decisions consider ethical, environmental and social criteria.

PART E: STANDARD OPERATING PROCEDURES AND FORMS

SOP 1: ETHICS COMPLAINT / REPORTING PROCEDURE

SOP Reference	BAC-SOP-EC-001
Applies To	All Staff, Students, Management — All Institutions
Owner	Group Ethics and Integrity Committee (GEIC)
Version	1.0 Effective 01 July 2025

Purpose

To establish a consistent, fair and confidential procedure for receiving, processing and resolving ethics complaints across all Institutions within the Group.

Procedure

Step	Action	Person Responsible	Timeline	Document
1	Complainant becomes aware of potential ethics breach.	Complainant	Upon awareness	—
2	Complainant completes Form ECF-001 and submits to IEC Secretary (or GEIC for Group-level matters). Anonymous complaints may be submitted via the anonymous portal or drop box.	Complainant	ASAP	Form ECF-001
3	IEC Secretary logs complaint in the Ethics Complaint Register and issues acknowledgement to complainant (if not anonymous).	IEC Secretary	Within 3 working days	Ethics Register
4	IEC Chairperson conducts preliminary screening: Is the complaint within scope? Is it prima facie substantiated? Is it frivolous/malicious?	IEC Chairperson	Within 5 working days	Screening Note
5a	If frivolous or outside scope: Close complaint and notify complainant with reasons.	IEC Chairperson	Within 5 working days of screening	Closure Notice
5b	If prima facie case: Formally open investigation, notify respondent (without disclosing complainant identity where possible), appoint Investigation Panel.	IEC Chairperson	Within 7 working days of screening	Investigation Commencement Notice
6	Investigation Panel gathers evidence (documents, interviews, site visits as necessary).	Investigation Panel	Within 30 working days	Investigation Report

7	Respondent given written opportunity to respond to findings (Show Cause).	Investigation Panel	During investigation	Show Cause Letter & Response
8	Investigation Panel submits report and recommendation to IEC.	Investigation Panel	Upon completion	Investigation Report
9	IEC deliberates and makes finding and recommendation on sanction.	IEC	Within 10 working days	IEC Resolution
10	IEC recommendation submitted to relevant authority (Head of Institution / GEIC) for decision.	IEC Chairperson	Within 5 working days	Decision Letter
11	Decision communicated to complainant and respondent. Right of appeal (14 calendar days) explained.	IEC Chairperson	Within 5 working days of decision	Decision Letter
12	Sanction implemented and monitored.	HR / Academic Affairs	Per decision	Sanction Record
13	Case closed and filed confidentially.	IEC Secretary	Upon completion of sanction	Ethics Register

Key Principles

- Natural justice: respondent has the right to know allegations and respond.
- Confidentiality: identities and details protected throughout.
- Timeliness: all timelines shall be adhered to; extensions require GEIC approval.
- Proportionality: sanctions commensurate with severity of breach.

SOP 2: CONFLICT OF INTEREST DISCLOSURE PROCEDURE

SOP Reference	BAC-SOP-COI-002
Applies To	All Staff and Management — All Institutions
Owner	Group Ethics and Integrity Committee (GEIC)
Version	1.0 Effective 01 July 2025

Purpose

To ensure that all actual, potential or perceived conflicts of interest are identified, disclosed and managed appropriately, protecting the integrity of institutional decision-making.

Triggering Events

A disclosure shall be made when a staff member or manager:

- Is newly appointed or commences a new role.
- Becomes aware of a new interest that could conflict with their duties.
- Is assigned to a committee, tender, assessment or decision-making process in which a conflict may arise.
- Completes the annual declaration cycle (January each year).

Procedure

Step	Action	Person Responsible	Timeline
1	Staff member identifies actual, potential or perceived conflict of interest.	Staff / Manager	Upon awareness
2	Staff member completes Form CIDF-002 and submits to direct supervisor and IEC Secretary.	Staff / Manager	Within 5 working days of awareness
3	Supervisor assesses the disclosed conflict in consultation with IEC Secretary.	Supervisor + IEC Secretary	Within 5 working days
4a	If no conflict: Confirm in writing; retain CIDF-002 on file.	IEC Secretary	Within 3 working days of assessment
4b	If conflict confirmed: Determine management measures (recusal, divestment, supervision, etc.).	IEC / Head of Institution	Within 10 working days
5	Management measures implemented and recorded.	HR / IEC Secretary	Per agreed plan
6	Annual review: all staff in management/oversight roles complete Form CIDF-002 by 31 January each year.	All relevant staff	31 January annually
7	IEC Secretary maintains Conflict of Interest Register.	IEC Secretary	Ongoing

SOP 3: ACADEMIC INTEGRITY INVESTIGATION PROCEDURE

SOP Reference	BAC-SOP-AI-003
Applies To	All Academic Staff and Students — All Institutions
Owner	Academic Affairs / Institutional Ethics Committee
Version	1.0 Effective 01 July 2025

Purpose

To provide a clear, fair and consistent procedure for investigating and resolving suspected breaches of academic integrity.

Procedure

Step	Action	Person Responsible	Timeline
1	Academic staff member suspects or detects potential academic misconduct (e.g. plagiarism detected via Turnitin or other tool; suspicious examination behaviour).	Academic Staff Member	Upon detection
2	Academic staff member completes Form AIIR-003 and submits to Head of Department (HoD).	Academic Staff Member	Within 2 working days of detection
3	HoD reviews the report. If clearly minor and first offence: HoD may handle informally (verbal warning + counselling). If serious or repeated: escalate to IEC Academic Integrity Panel.	HoD	Within 5 working days
4	Student notified in writing of the allegation and invited to respond within 7 working days.	HoD / IEC Secretary	Within 5 working days of escalation
5	Student submits written response and may request a hearing.	Student	Within 7 working days
6	Academic Integrity Panel reviews evidence and student's response; may convene a hearing.	Academic Integrity Panel	Within 15 working days
7	Panel makes finding and recommends sanction.	Academic Integrity Panel	Within 5 working days of hearing
8	Decision communicated to student. Right of appeal within 14 days.	HoD / IEC	Within 5 working days of decision
9	Sanction implemented (e.g., mark penalty, fail grade, suspension).	Academic Registry / HR	Per decision
10	Case recorded in Academic Integrity Register.	IEC Secretary	Upon closure

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ETHICS COMPLAINT / REPORTING FORM

Form Reference	ECF-001 Version 1.0
Version / Date	01 July 2025
Institution	(Please tick) ☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

SECTION A: COMPLAINANT DETAILS (Leave blank if anonymous)**Full Name:** _____**Staff ID / Student ID / External Party:** _____**Department / Programme / Organisation:** _____**Contact Email:** _____**Contact Phone:** _____

Do you wish to remain anonymous?

- ☐ Yes — I understand that anonymous complaints may limit the scope of investigation.
- ☐ No — I consent to my identity being disclosed to the Investigation Panel if necessary.

SECTION B: SUBJECT OF COMPLAINT (RESPONDENT)**Name of Person(s) Complained Against:** _____**Designation / Role:** _____**Department / Programme:** _____

Relationship to Complainant:

- ☐ Academic Staff
- ☐ Non-Academic Staff
- ☐ Management / Leadership
- ☐ Student
- ☐ Third Party / Vendor / Contractor

SECTION C: NATURE OF COMPLAINT

Category of Alleged Breach (tick all that apply):

- ☐ Academic Misconduct / Breach of Academic Integrity
- ☐ Bribery / Corruption / Fraud
- ☐ Conflict of Interest — Undisclosed
- ☐ Sexual Harassment
- ☐ Harassment / Bullying / Discrimination

- ☐ Misuse of Institutional Resources
- ☐ Data Privacy Breach
- ☐ Research Ethics Breach
- ☐ Misuse of Social Media / Technology
- ☐ Abuse of Authority
- ☐ Other (please specify): _____

SECTION D: DETAILS OF THE COMPLAINT

Date(s) of Incident: _____

Location of Incident: _____

Description of Incident (attach additional sheets if necessary):

SECTION E: EVIDENCE AND WITNESSES

Supporting Documents / Evidence Attached:

- ☐ Emails / Messages
- ☐ Documents / Reports
- ☐ Photographs / Videos
- ☐ Other: _____

Name(s) of Witnesses (if any): _____

SECTION F: DECLARATION

I declare that the information provided in this form is true and accurate to the best of my knowledge. I understand that knowingly making a false or malicious report is a breach of the BAC Education Group Ethics Policy and may subject me to disciplinary action.

Signature

Designation

Name (Block Letters)

Date

FOR OFFICIAL USE ONLY:

Date Received	Received By	Log No.	Initial Assessment

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CONFLICT OF INTEREST DECLARATION FORM

Form Reference	CIDF-002 Version 1.0
Version / Date	01 July 2025
Institution	(Please tick) ☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

SECTION A: DECLARANT DETAILS**Full Name:** _____**Staff ID:** _____**Designation / Position:** _____**Department:** _____**Date of Declaration:** _____**Type of Declaration:**

- ☐ Initial Declaration (upon appointment or new role)
- ☐ Ad Hoc Declaration (triggered by new interest or assignment)
- ☐ Annual Declaration (for year ending 31 December _____)

SECTION B: DECLARATION OF INTERESTS

Please complete all sections below. Where no interest exists, state 'NIL'.

Type of Interest	Details (Name of Entity / Relationship / Nature)	Potential Conflict with Duties?	If Yes, Describe Potential Conflict
Directorship / Shareholding in a company		Yes / No	
Outside employment or consultancy		Yes / No	
Family member employed at a supplier/vendor		Yes / No	
Family member enrolled as student at this Institution		Yes / No	
Personal relationship with a student under assessment		Yes / No	
Financial interest in any matter before a committee		Yes / No	
Any other interest		Yes / No	

SECTION C: DECLARATION

I declare that the information above is complete and accurate. I understand my obligation to update this declaration promptly if my circumstances change. I acknowledge that failure to disclose a conflict of interest is a breach of the BAC Education Group Ethics Policy.

Signature

Designation

Name (Block Letters)

Date**FOR OFFICIAL USE ONLY:**

Received By	Date	Assessment Outcome	Management Measures Required
		☐ No Conflict ☐ Conflict Identified	

Signature

Designation

Name (Block Letters)

Date

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ACADEMIC INTEGRITY INCIDENT REPORT

Form Reference	AIIR-003 Version 1.0
Version / Date	01 July 2025
Institution	(Please tick) ☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

SECTION A: REPORTING STAFF DETAILS

Staff Name: _____

Staff ID: _____

Subject / Module: _____

Programme: _____

Date of Detection: _____

SECTION B: STUDENT(S) DETAILS

Student Name	Student ID	Programme	Year / Semester

SECTION C: NATURE OF INCIDENT

Type of Academic Misconduct (tick all that apply):

- ☐ Plagiarism (from print / digital / AI sources)
- ☐ Cheating in Examination / Test
- ☐ Fabrication / Falsification of Data
- ☐ Collusion (unauthorised collaboration)
- ☐ Contract Cheating / Commissioning
- ☐ Impersonation
- ☐ Self-Plagiarism / Duplicate Submission
- ☐ Other: _____

Assessment / Assignment / Examination Title:**Submission Date / Examination Date:****Similarity Score (if applicable — attach report):**

Brief Description of Incident:**Evidence Attached:**

- ☐ Plagiarism detection report
- ☐ Original and submitted work
- ☐ Invigilator / witness statement
- ☐ Other: _____

Signature_____
Designation_____
Name (Block Letters)_____
Date**FOR OFFICIAL USE ONLY:**

Received by HoD	Date	Action Taken	Escalated to IEC?
		☐ Informal ☐ Formal	☐ Yes ☐ No

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ANNUAL ETHICS COMPLIANCE DECLARATION

Form Reference	AECD-004 Version 1.0
Version / Date	01 July 2025
Institution	(Please tick) ☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

This Annual Ethics Compliance Declaration is to be completed by all staff by 31 January each year for the preceding calendar year. It is a condition of continued employment that this declaration be completed honestly and in full.

SECTION A: STAFF DETAILS**Full Name:** _____**Staff ID:** _____**Designation:** _____**Department:** _____**Declaration Period:** 1 January _____ to 31 December _____**SECTION B: COMPLIANCE DECLARATIONS**

Declaration Statement	Yes	No	Comments / Actions Taken
I have read and understood the BAC Education Group Ethics Policy.	☐	☐	
I have complied with the BAC Education Group Ethics Policy in the past year.	☐	☐	
I have completed my Conflict of Interest Declaration (CIDF-002) for this year.	☐	☐	
I have not offered or accepted any bribe, corrupt payment or improper advantage.	☐	☐	
I have not been involved in any undisclosed conflict of interest.	☐	☐	
I have not engaged in any form of harassment, bullying or discrimination.	☐	☐	
I have not misused institutional resources, data or confidential information.	☐	☐	
I have attended the ethics/integrity training or awareness session this year.	☐	☐	
I have reported (or have no knowledge of) ethics breaches by others.	☐	☐	
I am aware of the whistleblowing mechanisms available to me.	☐	☐	

SECTION C: DECLARATION

I declare that the above statements are true and accurate. I understand that providing false information in this declaration is a serious breach of the BAC Education Group Ethics Policy and may result in disciplinary action.

Signature

Designation

Name (Block Letters)

Date

FOR OFFICIAL USE ONLY — Reviewed By:

Signature

Designation

Name (Block Letters)

Date

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RESEARCH ETHICS APPROVAL APPLICATION

Form Reference	REAA-005 Version 1.0
Version / Date	01 July 2025
Institution	(Please tick) ☐ Brickfields Asia College ☐ IACT College ☐ Reliance College ☐ Veritas University College ☐ UNIMY

This form must be completed and approved by the Institutional Research Ethics Committee (IREC) BEFORE commencement of any research involving human participants, animals, sensitive data or biological materials.

SECTION A: RESEARCHER DETAILS**Principal Researcher Name:** _____**Staff ID / Student ID:** _____**Department / School / Faculty:** _____**Programme (if student researcher):** _____**Supervisor Name (for student research):** _____**Co-Researchers (if any):** _____**Contact Email:** _____**SECTION B: RESEARCH DETAILS****Research Title:** _____**Proposed Commencement Date:** _____**Proposed Completion Date:** _____**Funding Source (if any):** _____**Type of Research:**

- ☐ Staff-led Research
☐ Postgraduate Research
☐ Undergraduate / Diploma Final Year Project
☐ Collaborative / External Research

SECTION C: ETHICS CHECKLIST

Question	Yes	No	Details (if Yes)
Does the research involve human participants?	☐	☐	
Does the research involve vulnerable populations (minors, prisoners, etc.)?	☐	☐	

Will informed consent be obtained from all participants?	☐	☐	
Does the research involve deception of participants?	☐	☐	
Will personally identifiable data be collected?	☐	☐	
Does the research involve animals?	☐	☐	
Does the research involve biological materials or hazardous substances?	☐	☐	
Could the research cause physical, psychological or social harm to participants?	☐	☐	
Does the research have external funding with conditions attached?	☐	☐	
Have any conflicts of interest been declared?	☐	☐	

Brief Description of Research Methodology and Ethical Safeguards:

_____ Signature	_____ Designation
_____ Name (Block Letters)	_____ Date

SUPERVISOR ENDORSEMENT (for student research):

I confirm that I have reviewed this application and am satisfied that appropriate ethical safeguards are in place.

_____ Signature	_____ Designation
_____ Name (Block Letters)	_____ Date

FOR IREC USE ONLY:

IREC Reference No.	Date Received	Level of Review	Decision	Conditions
		☐ Exempt ☐ ☐ Expedited ☐ ☐ Full	☐ Approved ☐ ☐ Conditional ☐ ☐ Rejected	

_____ Signature	_____ Designation
_____ Name (Block Letters)	_____ Date

POLICY APPROVAL AND SIGN-OFF

This Ethics Policy was reviewed, approved and adopted by the Board of Directors of BAC Education Group on the date indicated below.

Institution	Approving Authority	Signature	Date
BAC Education Group (Group Level)	Board of Directors		
Brickfields Asia College	Board of Governors / Principal		
IACT College	Board of Governors / Principal		
Reliance College	Board of Governors / Principal		
Veritas University College	Board of Governors / Vice Chancellor		
UNIMY	Board of Governors / Vice Chancellor		

Policy Review Commitment

This Policy shall be reviewed every two (2) years, or earlier in the event of material changes in applicable law, regulatory requirements, or institutional circumstances. The GEIC is responsible for coordinating the review and recommending updates to the Board.

Next Scheduled Review: 1 July 2027