AZERBAIJAN TECHNICAL UNIVERSITY

Anti-Bribery and Anti-Corruption Policy

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1. CONTEXT AND PURPOSE

Integrity and transparency are fundamental principles governing public institutions in the Republic of Azerbaijan. As a state technical university, Azerbaijan Technical University (hereinafter “AzTU”) operates within a legal and ethical environment that places strict obligations on the prevention of bribery, corruption, and abuse of authority.

AzTU recognises that bribery risks may arise in the university context through academic, administrative, procurement, financial, or employment-related activities. The purpose of this Anti-Bribery and Anti-Corruption Policy (hereinafter the “Policy”) is to establish a clear institutional framework that:

- affirms zero tolerance for bribery and corruption;
- defines expectations for ethical conduct at all levels of AzTU; and
- supports compliance with applicable anti-corruption laws and national integrity standards.

This Policy sets out principles, governance responsibilities, and institutional safeguards for preventing bribery and related misconduct. It applies to both staff and students and complements AzTU’s internal regulations, disciplinary frameworks, and financial control systems. Operational procedures and investigative processes are governed by separate instruments and relevant national authorities.

This Policy is developed in accordance with:

- the Constitution of the Republic of Azerbaijan;
- the Law of the Republic of Azerbaijan on Combating Corruption (No. 580-IIQ of 13 January 2004);
- AzTU’s Charter; and
- international frameworks, including the United Nations Convention against Corruption (UNCAC) and the OECD Anti-Bribery Convention.

2. KEY TERMS AND DEFINITIONS

For the purposes of this Policy, the following terms are used to ensure a shared and consistent understanding of anti-bribery and integrity standards at AzTU:

Bribery: The offering, promising, giving, requesting, or accepting of an undue advantage, whether directly or indirectly, to influence the performance of a duty or decision;

Corruption: The misuse of entrusted authority or position for personal benefit or for the benefit of third parties, including but not limited to bribery-related conduct;

Public Official: Any individual who holds a position within a state or public institution, including persons exercising administrative, academic, managerial, or financial authority within AzTU, as defined under applicable national legislation;

Undue Advantage: Any benefit that is not legitimately due, including money, gifts, services, preferential treatment, employment opportunities, or other material or non-material advantages;

Facilitation Payments: Informal or unofficial payments made to secure or expedite routine actions. Such payments are prohibited under this Policy regardless of value or local custom;

Gifts and Hospitality: Any items, services, or benefits offered or received in connection with AzTU activities. Gifts and hospitality may be permissible only where they are lawful, modest, transparent, and do not influence or appear to influence decision-making;

Conflict of Interest: A situation in which personal, financial, or other interests interfere, or may reasonably be perceived to interfere, with the impartial performance of official duties;

Third Parties: Individuals or entities acting on behalf of or in connection with AzTU, including suppliers, contractors, partners, intermediaries, and service providers;

Reporting a Concern: The act of raising, in good faith, a suspicion or allegation related to bribery, corruption, or unethical conduct through established institutional or legal channels.

3. APPLICABILITY

This Policy applies across AzTU and establishes mandatory standards for preventing bribery and corruption in all AzTU-related activities.

Specifically, this Policy applies to:

- **staff,** including academic, administrative, managerial, and support personnel, regardless of contract type or seniority;
- **students,** including in relation to academic integrity, admissions, assessment, progression, and access to AzTU services;
- **governance and decision-making,** including academic, financial, procurement, and human-resources processes;
- **third parties,** including suppliers, contractors, partners, intermediaries, and other entities acting for or on behalf of AzTU.

This Policy applies to conduct occurring:

- on AzTU premises;
- in activities carried out in the name of or connected with AzTU; and
- in interactions with public officials and external stakeholders related to AzTU operations.

The Policy operates alongside applicable national legislation and AzTU's internal regulations. It does not replace criminal, administrative, or disciplinary procedures established under law, which may apply independently of this Policy.

4. GOVERNANCE

Governance of anti-bribery at AzTU is embedded within existing leadership and control structures to ensure clear accountability, effective oversight, and compliance with national anti-corruption requirements.

Rectorate: Provides overall institutional leadership and oversight of the anti-bribery framework, approves this Policy and its revisions, and ensures alignment with national integrity obligations applicable to public institutions.

Vice-Rector responsible for Administrative and Financial Affairs: Holds executive responsibility for institutional anti-bribery controls, including oversight of financial integrity, procurement risk, and escalation of material bribery-related concerns.

Procurement Department: Ensures that procurement processes, supplier selection, and contract management operate in line with anti-bribery standards, including transparency, fair competition, and documented decision-making.

Finance and Accounting: Maintains financial control mechanisms designed to prevent improper payments, ensure traceability of transactions, and support detection of irregularities relevant to bribery risks.

Department of Human Resources Management: Integrates anti-bribery expectations into employment practices, including recruitment, appointment, promotion, and disciplinary processes, consistent with this Policy.

Education Department: Ensures that academic decision-making, including admissions, assessment, grading, and certification, is conducted free from bribery or undue influence.

Designated Anti-Bribery Officer: Acts as the institutional lead for the Policy implementation[1].

Governance responsibilities under this Policy operate within AzTU's established decision-making framework and do not replace statutory powers of national authorities responsible for investigation or prosecution of corruption-related offences.

5. ANTI-BRIBERY PRINCIPLES, RISK AREAS, AND INSTITUTIONAL STANDARDS

This section defines the core principles and institutional standards that govern the prevention of bribery at AzTU. It addresses areas where bribery risks may arise in a university setting and sets clear expectations for conduct across academic and administrative activities.

5.1. Zero-Tolerance and Lawful Conduct

AzTU maintains a zero-tolerance approach to bribery and related corrupt practices. Any form of offering, requesting, accepting, or facilitating an undue advantage in connection with AzTU activities is prohibited.

This standard applies irrespective of value, intent, or perceived custom and is aligned with national anti-corruption legislation and public-sector integrity requirements. Compliance with the law is treated as a minimum standard rather than a ceiling for ethical conduct.

5.2. High-Risk Institutional Areas

Bribery risks within a university environment most commonly arise where discretion, decision-making authority, or access to resources is involved. At AzTU, heightened attention is given to the following areas:

- procurement, contracting, and supplier selection;
- admissions, assessment, grading, and certification;

[1] Modelled in accordance with ISO 37001:2025 Anti-Bribery Management Systems — Requirements with guidance for use

- recruitment, promotion, and appointment of staff;
- allocation of scholarships, benefits, or institutional privileges; and
- engagement with third parties acting on behalf of AzTU.

Controls and oversight mechanisms are prioritised in these areas to reduce exposure to undue influence and improper advantage.

5.3. Gifts, Hospitality, and Other Benefits

Gifts, hospitality, or other benefits must never be used to influence, or appear to influence, institutional decisions. At AzTU, such benefits are acceptable only where they are lawful, modest, transparent, and clearly unrelated to any decision-making process.

Any benefit that could reasonably be perceived as creating an obligation, expectation, or preferential treatment is inconsistent with this Policy and must be refused or reported in accordance with institutional requirements.

5.4. Third-Party Integrity and Intermediaries

AzTU may interact with third parties in areas such as procurement, research collaboration, training, or service delivery. AzTU does not permit bribery or corrupt conduct to be carried out on its behalf by third parties.

Third-party relationships are expected to operate in line with AzTU's anti-bribery standards. Where relevant, integrity considerations form part of selection, engagement, and oversight processes.

5.5. Conflicts of Interest and Undue Influence

Conflicts of interest can increase exposure to bribery risks if not identified and managed appropriately. Individuals involved in decision-making are expected to act impartially and to avoid situations where personal interests could compromise, or appear to compromise, institutional integrity.

Where conflicts arise, they must be disclosed and managed through established institutional arrangements to prevent undue influence.

5.6. Reporting Concerns and Institutional Protection

AzTU encourages the reporting of suspected bribery or corrupt conduct. Students and staff who raise concerns in good faith are entitled to whistleblower protection from retaliation or disadvantage.

Concerns may be raised through established institutional channels or, where required, through competent national authorities. The handling of such concerns is governed by principles of fairness, confidentiality, and proportionality.

6. IMPLEMENTATION

This Policy is implemented through integration into AzTU's existing academic, administrative, financial, and procurement processes. Anti-bribery standards are applied at decision-making stages to prevent improper influence rather than addressed retrospectively. Implementation relies on established institutional controls, documentation requirements, and segregation of duties relevant to public-sector operations.

Supporting instruments, including internal regulations and guidance, operationalise this Policy where necessary. These instruments define detailed processes related to financial controls, procurement practices, conflict-of-interest management, and reporting of concerns, while ensuring consistency with the principles set out in this Policy.

Formal anti-bribery concerns are addressed through established institutional and legal channels that give effect to this Policy and ensure consistent, fair, and timely handling. Implementation responsibilities follow the governance framework set out in Section 4 and operate without prejudice to the statutory powers of national authorities responsible for investigation or enforcement.

7. MONITORING AND PERFORMANCE INDICATORS

Monitoring under this Policy ensures that anti-bribery standards are applied consistently across AzTU and that institutional controls remain effective in preventing and detecting corruption risks. Oversight focuses on governance assurance, control effectiveness, and identification of systemic vulnerabilities rather than case-level management.

Monitoring draws on existing institutional sources, including internal audits, financial controls, procurement oversight, and risk reviews. Particular attention is given to areas with elevated exposure to bribery risks, such as procurement, financial approvals, academic decision-making, and third-party engagement.

Aggregated information related to reported bribery or corruption concerns is considered as part of monitoring to identify trends, recurring risk patterns, and control gaps. Individual cases are addressed through established institutional and legal channels and are not managed within this Policy.

Monitoring outcomes are reviewed through appropriate governance channels and inform improvements to controls, awareness measures, and supporting instruments where necessary.

7.1. Disclosure Requirements

AzTU officials are subject to financial disclosure obligations as defined in the Law of the Republic of Azerbaijan on Combating Corruption[2]. These individuals must submit annual declarations that include:

- Income earned during the reporting year, specifying the source, type, and amount;
- Taxable property including land, buildings, and vehicles;
- Deposits, securities, and financial assets held in banks or other institutions;
- Participation as a shareholder or founder in any companies, funds, or other economic entities, and the property share held in such enterprises;
- Debts exceeding 5,500 AZN (threshold subject to revision if national legislation changes);
- Other financial or property obligations exceeding 1,100 AZN (threshold subject to revision if national legislation changes).

These declarations must be submitted using the official national disclosure forms and procedures. The Designated Anti-Bribery Officer is responsible for ensuring timely awareness and internal coordination regarding this requirement.

[2] Law of the Republic of Azerbaijan on Combating Corruption, adopted 13 January 2004, Article 5.

8. POLICY EVOLUTION

This Policy is reviewed periodically to ensure continued relevance[3], effectiveness, and alignment with national anti-corruption requirements and institutional risk profiles. Reviews consider monitoring outcomes, audit findings, and developments in public-sector governance and integrity standards.

The Policy is reviewed every two years, or earlier where material risks or regulatory changes arise. Any revisions are approved by the Rectorate. Substantive procedural changes are implemented through separate supporting instruments and do not form part of this Policy.

[3] Aligned with the United Nations Convention against Corruption (UNCAC), Articles 8 and 9.

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SUSTAINABLE DEVELOPMENT GOALS

