

Anti-corruption policy of Baku Eurasian University

It was discussed and approved at
The meeting of Scientific Council
at Baku Eurasian University
on 01.05.2026.

1. Basic provisions

1.1. The anti-corruption policy of the Baku Eurasian University includes the prevention of corruption offenses in the activities of the Baku Eurasian University, as well as a set of interrelated principles, procedures and activities aimed at preventing such offenses.

1.2. The anti-corruption policy was developed in accordance with the Criminal Code of the Republic of Azerbaijan, the Code of Administrative Offenses of the Republic of Azerbaijan and the Law of the Republic of Azerbaijan "On Combating Corruption".

1.3. The purpose of the anti-corruption policy is to ensure the complex and coordinated application of legal and organizational measures aimed at the fight against corruption.

1.4. The objectives of the Anti-Corruption Policy are as follows:

1.4.1. Information about the legal basis of anti-corruption work and responsibility for corruption offenses;

1.4.2. Determining the main directions of corruption prevention in the activity of Baku Eurasian University;

1.4.3. Development of intolerance to corrupt behavior among employees and students of Baku Eurasian University.

1.5. The anti-corruption policy applies to employees and students of the Baku Eurasian University, to persons who provide services (perform work) based on civil contracts concluded with the Baku Eurasian University.

1.6. Employees and students of the Baku Eurasian University, as well as persons providing services (doing work) under civil contracts concluded with the Baku Eurasian University are responsible for non-compliance with the Anti-Corruption Policy in accordance with the current legislation of the Republic of Azerbaijan.

1.7. Revision and amendments to the Anti-Corruption Policy are carried out based on the results of the monitoring of the effectiveness of anti-corruption measures, standards and procedures carried out by the Baku Eurasian University, as well as the legislation of the Republic of Azerbaijan on the fight against corruption, when there are changes in the labor legislation.

2. Terms and definitions

As part of the implementation of the Anti-Corruption Policy, the following terms and concepts are used:

2.1. Corruption - illegal acquisition of material and other benefits, privileges or concessions by officials using their status, the status of the body (institution) they represent, their official powers or the opportunities arising from those status and powers, as well as those mentioned by individuals and legal entities is the capture of those officials by illegally offering or promising or giving material and other benefits, privileges or concessions to officials. Corruption is also the commission of the listed actions on behalf of a legal entity or for its benefit (Law No. 580-IIQ dated January 13, 2004 of the Republic of Azerbaijan "On Combating Corruption").

2.2. Fight against corruption:

1) prevention of corruption, including identification and elimination of the causes of corruption (corruption prevention);

2) to identify, prevent, disclose and investigate corruption offenses (fighting against corruption);

3) to minimize and (or) eliminate the consequences of corruption offenses.

All state bodies, local self-government bodies, institutions and officials carry out the fight against corruption within their powers. When the commission of offenses related to corruption creates administrative or criminal responsibility, the fight against corruption is carried out by law enforcement agencies in the manner established by legislation (Law of the Republic of Azerbaijan No. 580-IIQ dated January 13, 2004 "On the fight against corruption" 4th article).

2.3. Corruption warning is an activity of Baku Eurasian University aimed at implementing elements of corporate culture, rules and procedures regulated by internal regulations that ensure the prevention of corruption offenses.

2.4. Bribery - obtaining money, securities, other property by an official personally or through an intermediary, or providing him with illegal property services, granting other property rights due to the commission of actions (inaction) in favor of the person giving the bribe or the persons represented by him.

2.5. Commercial bribery - illegal giving of money, securities, other property to a person who performs management functions in a commercial or other organization, providing him with property services, giving him other property rights to perform actions (inaction) in accordance with the interests of the bribe giver in connection with the position held by this person.

2.6. Conflict of interest - when the personal interest of the employee (representative of the organization) (directly or indirectly) affects or may affect the proper performance of his official (labor) duties, causes or may create a conflict between employees, personal interest of the employee (representative of the organization) a situation where the interests and rights and legal interests of citizens, organizations may harm the rights and legal interests of citizens, the property and (or) business reputation of the organization to which it belongs.

Conflict of interests of academic staff - a situation in which a pedagogic worker has personal interests in obtaining material benefits or other advantages while performing his professional activities, and there is a conflict between his personal interests and the interests of the student, his parents (legal representatives), which affects the proper performance of the teacher's professional duties.

2.7. Personal interest of the employee (representative of the organization) - the interest of the employee (representative of the organization) related to the opportunity to receive income in the

form of money, valuables, other property or services for himself or third parties while performing official duties.

3. Basic principles of anti-corruption activity at Baku Eurasian University

3.1. The principle of compliance of the Anti-Corruption Policy with the existing legislation and generally accepted norms.

Compliance of anti-corruption measures implemented with the Constitution of the Republic of Azerbaijan, international agreements to which the Republic of Azerbaijan is a party, the legislation of the Republic of Azerbaijan and other normative legal acts applicable to the Baku Eurasian University.

3.2. The personal role model principle of leadership.

The main role of the management of the Eurasian University of Baku in creating a culture of zero tolerance for corruption and creating an internal system for preventing and fighting corruption.

3.3. The principle of involvement of employees and students.

Informing BAAU employees and students about the provisions of anti-corruption legislation and their active participation in the formation and implementation of anti-corruption standards and procedures.

3.4. The principle of proportionality of anti-corruption procedures to the risk of corruption.

The preparation and implementation of a complex of measures to reduce the possibility of involvement of employees and students in corruption activities of the Baku Eurasian University is carried out taking into account the risks of corruption existing in the activity of the Baku Eurasian University.

3.5. Principle of effectiveness of anti-corruption procedures. Implementation of anti-corruption measures that are inexpensive, easy to implement and have significant results at the Baku Eurasian University.

3.6. The principle of inevitability of responsibility and punishment. The inevitability of punishment, as well as the responsibility of the management of BAAU for fulfilling the anti-corruption obligations within the organization, when BAAU employees commit corruption offenses in connection with the performance of their duties, regardless of their positions, seniority and other conditions.

3.7. The principle of openness. To inform partners and the public about the anti-corruption standards adopted in the activity of the Baku Eurasian University.

3.8. The principle of constant control and regular monitoring. Regular monitoring of the effectiveness of implemented anti-corruption standards and procedures, as well as control over their implementation.

4. Duties of BAAU employees and students to prevent and fight corruption

4.1. Employees and students of the Baku Eurasian University are obliged to:

- 4.1.1. refrain from committing and (or) participating in the commission of corruption offenses;
- 4.1.2. refrain from behavior that could be interpreted by others as being willing to commit or participate in the commission of a corruption offense;
- 4.1.3. Immediately inform the BAAU official who is responsible for the implementation of anti-corruption measures in accordance with the division of powers established in the BAAU about cases of incitement to commit corruption offenses;
- 4.1.4. To immediately report information about cases of corruption offenses committed by other employees and students;
- 4.1.5. To inform direct management about the conflict of interest that has occurred or the possibility of a conflict of interest;
- 4.1.6. To perform other duties on prevention and fight against corruption, determined by the internal rules of the Baku Eurasian University.

5. List of anti-corruption measures, standards and procedures and the order of their implementation

5.1. The following anti-corruption measures, standards and procedures are implemented at the Baku Eurasian University:

5.1.1. implementation of a unified anti-corruption policy and regulatory support in the field of corruption prevention, including:

5.1.1.1. Approval and application of the Anti-Corruption Policy, as well as other internal normative acts of the Baku Eurasian University and documents defining anti-corruption measures, standards and procedures;

5.1.1.2. Adoption and implementation of ethical code of conduct for BAAU employees;

5.1.1.3. Approval of the anti-corruption plan of Baku Eurasian University for certain periods;

5.1.1.4. Inclusion of a standard anti-corruption clause in contracts related to BAAU's economic activity;

5.1.1.5. Inclusion of anti-corruption clauses in the labor contracts of BAAU employees;

5.1.2. Conducting and informing BAAU employees and students on the issues of preventing and fighting corruption, as well as the development of intolerance to corrupt behavior;

5.1.3. Checking compliance with the legislation of the Republic of Azerbaijan on the fight against corruption in BAAU.

5.2. The prevention of corruption and the implementation of anti-corruption measures, standards and procedures at the Baku Eurasian University are carried out in accordance with the approved anti-corruption plan at the Baku Eurasian University.

6. Whistleblowing Channel

6.1. Baku Eurasian University establishes a formal whistleblowing mechanism through which employees, students, and third parties may report suspected or actual corruption offenses, attempts at bribery, or related misconduct. The responsible body for receiving and processing such reports is the Executive Body of the University.

6.2. Reports may be submitted through the following channels: by electronic mail to info@baau.edu.az; through a written application addressed to the Executive Body; or in person at the office of the Executive Body during designated working hours. All reports, regardless of the channel used, shall be registered and forwarded to the Executive Body for initial review without delay.

6.3. Reports should, to the extent possible, include a description of the alleged offense, the persons involved, supporting evidence or documentation, and the date and circumstances of the incident. However, the absence of complete information shall not by itself be grounds for refusing to consider a report.

7. Whistleblower Protection

7.1. The University guarantees the confidentiality of the identity of any person submitting a report in good faith. Information that could reveal the identity of the reporting individual shall be disclosed only to those persons directly involved in the investigation and only to the extent strictly necessary, unless disclosure is required by law or by a competent authority.

7.2. The University strictly prohibits any form of retaliation against employees or students who report suspected corruption in good faith, including but not limited to dismissal, demotion, salary reduction, harassment, intimidation, exclusion from academic or professional opportunities, or any other adverse treatment connected to the making of such a report.

7.3. Any person who makes a report in good faith, based on a reasonable belief that the information reported is true at the time of reporting, shall be fully protected from adverse consequences arising from that report, even if the report is subsequently found, after investigation, not to be substantiated. This protection does not extend to individuals who knowingly submit false, malicious, or fabricated reports with intent to harm another person or to disrupt the University's operations; such individuals shall themselves be subject to disciplinary measures under this Policy.

8. Disciplinary Framework

8.1. The University applies a proportionate and graduated system of sanctions for violations of this Policy, taking into account the severity, frequency, and consequences of the offense, as well as the position and level of responsibility of the offender.

8.2. The disciplinary measures available under this Policy include, in order of increasing severity: a verbal warning; a written warning entered into the employee's or student's disciplinary record; deduction of salary or forfeiture of bonuses and incentive payments; demotion to a lower position; temporary suspension from duties or studies; and termination of the employment contract for staff or expulsion for students.

8.3. With respect to contractors, suppliers, or other third parties engaged under civil contracts, violations of anti-corruption obligations shall result in the unilateral termination of the relevant contract by the University, without prejudice to any other remedies available under applicable law.

8.4. Where the conduct in question constitutes a criminal or administrative offense under the legislation of the Republic of Azerbaijan, the matter shall be referred to the competent law enforcement authorities, irrespective of any internal disciplinary action taken by the University.

9. Ethics and Anti-Corruption Committee

9.1. The University establishes an Ethics and Anti-Corruption Committee responsible for the implementation, oversight, and enforcement of this Policy. The Committee shall be composed of representatives including, but not limited to, the relevant Vice-Rector(s), a representative of the Executive Body, Deans of faculties, and a representative of the Quality Assurance Sector.

9.2. The Committee is authorized to receive reports of suspected corruption, conduct or oversee investigations into such reports, request information and documentation from relevant University departments, recommend disciplinary measures in accordance with Section 8 of this Policy, and report its findings and recommendations directly to the Rector.

9.3. To ensure accessibility and transparency, the University shall publish the names, positions, office locations, and contact telephone numbers of all Committee members on the University's official website and shall update this information whenever changes in composition occur.

10. Investigation Procedures

10.1. Upon receipt of a report, the Executive Body shall commence a preliminary review within five (5) working days to determine whether the matter falls within the scope of this Policy and warrants formal investigation.

10.2. Where a formal investigation is initiated, it shall be completed within a maximum period of thirty (30) calendar days from the date of commencement, save in exceptional circumstances requiring extension, which shall be documented and communicated to the Committee.

10.3. All parties involved in an investigation, including the person against whom allegations are made, shall be afforded the right to be heard and to present relevant evidence or explanations before any final determination is made.

10.4. The findings of the investigation, together with the decision and any recommended disciplinary measures, shall be communicated in writing to the Rector, the Committee, and, to the extent appropriate and consistent with confidentiality obligations, to the parties concerned.

11. Financial Oversight and Procurement Transparency

11.1. All procurement of goods, services, and works by the University shall be conducted through open and competitive tender procedures, with tender announcements made publicly available to ensure fairness and transparency.

11.2. Expenditures exceeding a threshold to be determined by the University's financial regulations shall be subject to a multi-stage approval process, requiring authorization at successive levels of financial and administrative responsibility before disbursement.

11.3. The University's internal audit function shall conduct periodic reviews of financial transactions, procurement processes, and contractual arrangements to identify and mitigate corruption-related risks.

12. Third-Party Due Diligence

12.1. Prior to engaging any contractor, supplier, or other third party, the University shall conduct a reasonable assessment of the reputational risk associated with that party with respect to corruption, bribery, or related unethical conduct.

12.2. As a condition of contracting, the University shall require third parties to execute an anti-corruption declaration or undertaking, affirming their commitment to compliance with applicable anti-corruption legislation and with the principles of this Policy.

13. Anti-Corruption Training

13.1. The University shall conduct mandatory anti-corruption training on an annual basis for all employees, covering the legal framework, the provisions of this Policy, reporting mechanisms, and individual responsibilities.

13.2. All newly hired employees shall complete an onboarding anti-corruption training session as part of their induction process, prior to or shortly after the commencement of their duties.

13.3. Completion of training shall be confirmed through an online testing or certification process, the records of which shall be maintained by the relevant University department for compliance verification purposes.

14. Conflict-of-Interest Disclosure Mechanism

14.1. All relevant employees shall complete an annual Conflict-of-Interest Declaration form, disclosing any personal, financial, or familial interests that could reasonably affect, or appear to affect, the proper performance of their official duties.

14.2. Where a new conflict of interest arises outside the annual declaration cycle, the employee concerned shall disclose it in writing to their direct supervisor and to the Executive Body within five (5) working days of becoming aware of the conflict.

15. Reporting and Accountability

15.1. The Executive Body, in coordination with the Ethics and Anti-Corruption Committee, shall prepare an Annual Anti-Corruption Report summarizing the implementation of this Policy, including statistics on reports received, investigations conducted, and disciplinary measures applied.

15.2. The Annual Anti-Corruption Report shall be submitted to the Scientific Council for review, and a summary thereof shall be made publicly available on the University's official website to demonstrate the institution's ongoing commitment to transparency and accountability.

16. Review and Revision

This Policy shall be reviewed and, where necessary, revised at least once every two (2) years, or earlier if required by changes in the legislation of the Republic of Azerbaijan, international anti-corruption standards, or the results of internal monitoring. Until a new version of the Policy is formally adopted, the existing version shall remain in full force and effect.