

AZERBAIJAN STATE OIL AND  
INDUSTRY UNIVERSITY



## ANTI-CORRUPTION POLICY





Azerbaijan State Oil and Industry University

Those charged with governance

Anti-Bribery Office

## **Anti-Corruption and Anti-Bribery Policy**

October 2025

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Approved by Rectorate

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# 1. POLICY STATEMENT AND PURPOSE

Azerbaijan State Oil and Industry University (hereinafter “ASOIU”) is firmly committed to maintaining the highest standards of integrity, accountability, and transparency in all of its academic, research, administrative, and operational activities. This Anti-Corruption and Anti-Bribery Policy (hereinafter “Policy”) establishes a zero-tolerance approach toward all forms of corruption, bribery, and abuse of position.

This Policy is developed in accordance with:

- The Constitution of the Republic of Azerbaijan;
- The Law of the Republic of Azerbaijan on Combating Corruption
- ASOIU’s Charter
- International frameworks including the United Nations Convention against Corruption (UNCAC) and the OECD Anti-Bribery Convention

This policy is designed to:

- Prevent, identify, and respond to corruption and bribery risks within the ASOIU;
- Foster a culture of integrity, ethics, and accountability across all ASOIU units;
- Ensure compliance with both national legislation and international standards;
- Enhance ASOIU’s reputation as a trustworthy and transparent academic institution;
- Promote awareness and understanding of anti-corruption principles through mandatory training programs for all staff, students, and associated persons.

ASOIU recognizes that corruption can undermine institutional credibility, distort academic decisions, waste public resources, and damage international cooperation. All members of the ASOIU community, including academic and administrative staff, students, vendors, contractors, and other external parties are expected to uphold the principles outlined in this Policy.

As a public academic institution funded primarily through public resources, benefactions, and contributions from charitable organizations, ASOIU is committed to protecting itself and its funders, donors, employees, and students from the risks associated with bribery, corruption, and fraud.

ASOIU is committed to proactive prevention through internal control systems, training, annual declarations, oversight mechanisms, and effective enforcement.

The Anti-Bribery Officer is primarily responsible for executing this Policy on a daily basis

and for overseeing its application and impact. Leaders at every level are tasked with ensuring that their subordinates are informed about and comprehend this policy.

ASOIU's Anti-Corruption Compliance Ecosystem integrates all core governance functions to ensure transparency, accountability, and institutional integrity.

**Figure 2. Roles and Responsibilities Matrix**



## 2. KEY TERMS AND DEFINITIONS

For the purpose of this Policy, the following terms are used with the meanings set out below:

- **Bribery** refers to:
  - offering, promising, giving, requesting, or accepting a financial or other advantage in circumstances occurring inside or outside the Azerbaijan which are intended to induce or reward improper performance of a function or activity that:
    - I. is of a public nature, performed in the course of a person's employment, connected with a business or trade, or performed on behalf of a body of people; and
    - II. a reasonable person in the Azerbaijan would expect to be performed in good faith, impartially or in accordance with a position of trust;
  - offering, promising or giving a financial or other advantage to a Public Official outside the Azerbaijan (or somebody else nominated by that official) intending to influence the official in the performance of their official functions in order to obtain or retain business or a business advantage;
- **Corruption** refers to any abuse of entrusted power or position for private gain. Corruption includes, but is not limited to, bribery, embezzlement, nepotism, and facilitation payments.
- **Facilitation Payments** refers to minor unofficial payments made to expedite routine governmental or institutional actions; these are strictly prohibited.
- **Fraud** refers to an act or omission, made with the intent of making a financial gain, or causing a financial loss, or exposing another to the risk of a financial loss, in which a person:
  - dishonestly makes a false representation; or
  - dishonestly fails to disclose information which he or she is under a legal duty to disclose; or
  - occupies a position in which he or she is expected to safeguard, or not act against, the interests of another person and dishonestly abuses that position; or
  - intends, by means of that abuse of that position to make a gain for himself or herself or another, or to cause loss to another or to expose another to the risk of loss.
- **Academic Misconduct** refers to dishonest behavior in academic contexts such as

plagiarism, ghostwriting, data falsification, or providing academic favors in exchange for gifts or benefits.

- **Public Official** refers to someone who holds a legislative, administrative or judicial position of any kind, whether appointed or elected; someone who exercises a "public function" for any country or territory (or any subdivision of such a country or territory); or an official of or agent of a public international organization (e.g., UN).
- **Staff** refers to all individuals working within the ASOIU at all levels and grades, including officers, employees (whether permanent, fixed term or temporary), workers, trainees, seconded staff, agency staff, volunteers, interns or any other person working in any context within the institution.
- **Associated Person/s** refers to any individual or organization performing services for and on behalf of the ASOIU, which may include the ASOIU's subsidiaries, recipients of grants, partners in collaborative working arrangements and joint ventures, suppliers, distributors, business contacts, agents, advisers, and government and public bodies.
- **Reasonable Person Standard** refers to judgments within this Policy are to be assessed according to the understanding and behavior expected of a reasonable person within the context of Azerbaijani law and academic norms.

### 3. SCOPE AND APPLICABILITY

This Policy applies to all individuals and entities associated with ASOIU, hereafter referred to as Staff and Associated Persons, as defined in Section 2. This includes, but is not limited to:

- Academic and administrative staff (full-time, part-time, contract-based);
- Students (undergraduate, graduate, and doctoral);
- Members of university governing bodies;
- External collaborators, vendors, suppliers, consultants, and contractors;
- Interns, volunteers, and temporary personnel.

The Policy extends to all activities undertaken in the name of, or on behalf of, ASOIU, regardless of geographic location, funding source, or legal jurisdiction. This includes academic research, procurement processes, student admissions, project implementation, fundraising, travel, financial management, and partnership agreements.

All such persons are expected to uphold the standards and obligations set forth in this Policy and will be held accountable for violations.

Any Staff and Associated Person managing third-party relationships is responsible for ensuring that those third parties are aware of this Policy and, where appropriate, are required to formally acknowledge and comply with its principles.

## 4. GOVERNANCE AND RESPONSIBILITIES

Clear roles and responsibilities are essential to ensuring the effective implementation and oversight of this Policy. The following assignments are tailored to ASOIU's governance structure:

### RECTOR

Holds ultimate accountability for institutional integrity and overall anti-corruption governance at ASOIU. Approves this Policy and appoints responsible officers to oversee its execution.

### ANTI-BRIBERY OFFICER

Acts as the institutional lead for the Policy implementation<sup>1</sup>. Responsibilities include:

- Maintaining the Gift and Hospitality Register;
- Collecting and securely storing Conflict of Interest (COI) Declarations;
- Receiving and coordinating investigation of corruption-related reports;
- Advising on disciplinary procedures in response to substantiated violations.
- Ensuring regular Policy review and staff awareness efforts.
- Conducting regular risk assessments across all university functions to identify potential bribery or corruption vulnerabilities.
- Ensuring that all newly recruited staff receive mandatory anti-bribery orientation as part of their induction programme.

### HEADS OF INSTITUTIONS

Responsible for local enforcement of this Policy within their academic or administrative units. Their duties include:

- Communicating the Policy to all relevant Staff and Associated Persons;
- Monitoring compliance and supporting reporting channels;
- Facilitating required trainings and declarations within their units.

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<sup>1</sup> Modelled in accordance with ISO 37001:2025 Anti-Bribery Management Systems — Requirements with guidance for use

## STAFF AND ASSOCIATED PERSONS

Have a duty to:

- Understand and comply with this Policy;
- Promptly report any suspected corruption or bribery violations;
- Participate in mandatory trainings and submit required declarations;
- Avoid conflicts of interest and declare any potential risks proactively.

**Figure 2. Roles and Responsibilities Matrix**

Role	Policy Oversight	COI Declarations	Gift Register	Investigations	Awareness & Training
Rector	Approves the policy and assigns responsibilities	—	—	Makes final decisions on serious violations	Approves institutional awareness strategy
Anti-Bribery Officer	Leads implementation and oversight	Collects, stores, and reviews declarations	Maintains and reviews the Gift and Hospitality Register	Coordinates investigation processes	Leads Policy communication and training
Heads of Institutions	—	—	—	Refers potential violations to Anti-Bribery Officer	Facilitates awareness within department
Staff and Associated Persons	Complies with the policy	Submits accurate and timely declarations	Reports gifts as required by Policy	Reports suspected violations	Participates in required trainings

## 5. PROHIBITED ACTIVITIES

ASOIU prohibits all forms of corruption, bribery, and related misconduct, regardless of the context or value involved. The following actions are strictly forbidden for all Staff and Associated Persons:

- Offering, giving, soliciting, or receiving bribes, kickbacks, or facilitation payments;

- Engaging in academic misconduct such as plagiarism, ghostwriting, or data falsification for personal or institutional gain;
- Using one's position to obtain undue personal gain or benefits for others;
- Falsifying documents, records, or financial statements for personal advantage;
- Engaging in favoritism, nepotism, or conflicts of interest without disclosure;
- Accepting or providing gifts or hospitality in violation of Section 6;
- Retaliating against any individual who raises a concern or cooperates in an investigation;
- Failing to report a suspected violation of this Policy;
- Failing to disclose a known conflict of interest or undeclared gift or benefit;
- Facilitating cheating, exam fraud, unauthorized academic assistance, or manipulation of grading or evaluation systems;
- Manipulating or misusing grant funds, research budgets, or project resources.

These prohibitions apply in all settings, including academic decisions, research, hiring, procurement, admissions, grant management, and partnerships. Violations may lead to disciplinary measures, contract termination, and, where applicable, referral to legal authorities.

## **GIFTS AND HOSPITALITY**

ASOIU recognizes that in some cultural and professional contexts, modest gifts or hospitality may be offered or received as part of customary interactions. However, such gestures can lead to real or perceived conflicts of interest and are therefore subject to strict rules. All Staff and Associated Persons must:

- Not accept or offer any gift or hospitality that could influence, or appear to influence, a business or academic decision;
- Not accept gifts or hospitality with an estimated value above 55 AZN (threshold subject to revision if national legislation changes), in accordance with national law (Law on Combating Corruption, Article 8);
- Declare any gift or hospitality valued at or below 55 AZN (threshold subject to revision if national legislation changes) in the ASOIU Gift and Hospitality Register if it relates to university business or may be perceived as influencing decision-making.

The Gift and Hospitality Register is collected, stored and reviewed annually by the Anti-Bribery Officer. Cultural gifts or symbolic items may be retained only if:

- Their value does not exceed 55 AZN (threshold subject to revision if national legislation changes), or
- They are formally declared and approved as non-influential by the Anti-Bribery Officer.

Where refusal of a gift would cause offense or jeopardize a relationship, the gift must still be declared and guidance sought from the Anti-Bribery Officer or relevant unit head.

Failure to comply with above-mentioned requirements may result in disciplinary action under this Policy.

## **6. REPORTING, INVESTIGATION AND COMPLAINT MECHANISMS**

ASOIU encourages all members of the university community to report any suspected or actual violation of this Policy. To ensure integrity, confidentiality, and trust, the following mechanisms have been established:

### **COMPLAINT MECHANISMS**

Staff and Associated Persons are expected to report suspected corruption, bribery, fraud, or related misconduct as soon as they become aware of it. These reports may be made:

- Directly to the Anti-Bribery Officer;
- Through a secure, anonymous reporting channel provided by the ASOIU (hotline or encrypted web form);
- In writing to the Rector's Office, where appropriate.

Reports may be submitted anonymously. All disclosures will be treated with the utmost confidentiality. No proof is required at the time of reporting, but the information must be provided in good faith.

### **INVESTIGATION AND CASE MANAGEMENT**

All reported incidents will be promptly reviewed and, where warranted, investigated under the direction of the Anti-Bribery Officer (see Governance in Section 4). The investigation process will include:

- Acknowledgment of the report;
- Initial risk and credibility assessment;

- Assignment of a case investigator;
- Fact-finding and evidence gathering;
- Documentation and decision report.

Where a violation is confirmed, appropriate disciplinary action will be taken, and systemic improvements will be proposed to prevent recurrence. If applicable, cases may be referred to law enforcement authorities.

Judgments about whether a violation occurred will be based on the understanding and behavior expected of a reasonable person under similar circumstances.

Investigations will follow principles of objectivity, confidentiality, and fairness. Persons accused will have the opportunity to respond to allegations.

## **WHISTLEBLOWER PROTECTION**

ASOIU strictly prohibits retaliation against anyone who, in good faith, reports misconduct or participates in an investigation. This includes dismissal, demotion, harassment, or any adverse action.

Protection applies regardless of the outcome of the investigation. Any attempt to intimidate or retaliate against whistleblowers will itself be treated as a serious violation and may result in disciplinary measures.

ASOIU will maintain procedures to ensure whistleblower identity is protected to the greatest extent possible.

## **CONFLICT OF INTEREST DECLARATION**

All Staff and Associated Persons are required to disclose any personal, financial, or academic relationships that could give rise to a conflict of interest. These declarations must be:

- Submitted annually using the official Conflict of Interest Declaration Form provided by Anti-Bribery Officer;
- Updated immediately when a new potential conflict arises.

Completed forms will be stored confidentially and reviewed by the Anti-Bribery Officer. Anti-Bribery Officer is responsible for identifying and managing conflicts, including removing affected individuals from decision-making processes.

Failure to disclose a known conflict may be grounds for disciplinary action.

## **FINANCIAL DISCLOSURE REQUIREMENTS**

ASOIU officials are subject to financial disclosure obligations as defined in the Law of the

Republic of Azerbaijan on Combating Corruption<sup>2</sup>. 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 Anti-Bribery Officer is responsible for ensuring timely awareness and internal coordination regarding this requirement.

## 7. REVIEW AND CONTINUOUS IMPROVEMENT

This Policy will be reviewed every two years, or earlier if significant legal, structural, or operational changes occur.

The review is coordinated by the Anti-Bribery Officer, in consultation with the Rector, Vice-Rectors, and relevant administrative departments, and submitted to the Rectorate for endorsement.

The review process assesses the effectiveness of reporting channels, investigation procedures, and preventive measures.

Lessons learned from completed cases and audit findings will inform updates to training, risk assessment, and internal controls.

Continuous improvement will be achieved through<sup>3</sup>:

- Regular benchmarking against national anti-corruption legislation and international good practice;
- Periodic staff awareness and refresher training;
- Integration of anti-bribery principles into institutional decision-making and procurement processes.

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<sup>2</sup> Law of the Republic of Azerbaijan on Combating Corruption, adopted 13 January 2004, Article 5.

<sup>3</sup> Aligned with the United Nations Convention against Corruption (UNCAC), Articles 8 and 9,