



ANTI- BRIBERY AND CORRUPTION POLICY

Baku 2023

DƏYİŞİKLİKLƏRİN QEYDİYYATI VƏRƏQƏSİ

Sıra №-si	Bölmə	Təsviri	Yenidən baxılma tarixi	Hazırladı	Təsdiq etdi

1. INTRODUCTION

1.1 Anti-Bribery and Corruption Policy It is the University's policy that all employees and students conduct their business in a honest way without using bribery or corrupt practices to obtain an unfair advantage.

1.2 Bribery is a criminal offence in most countries, it erodes the integrity of the academic environment, which relies on merit, fairness, and transparency. Bribery in universities harms society by perpetuating corruption and hindering the development of a fair and just academic system. Corrupt acts expose the University and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the University's reputation.

1.3 This policy must be reviewed annually by the university's audit committee. Concerns and comments may be reported, in confidence, to Department of Legal Affairs who has oversight of the management of the policy within the university.

2. PURPOSE OF THE POLICY

2.1 Purpose of the Anti- bribery and Corruption Policy is:

- a) To define the responsibilities of Western Caspian University and its employees regarding compliance with and promotion of our stance against bribery and corruption
- b) To provide comprehensive information and guidance to university staff on the identification and effective management of bribery and corruption situations

3. SCOPE OF THE POLICY

3.1 This policy is applicable to:

- a) all geographic functions and sites within the University
- b) all partners, branches, offices, and subsidiary companies
- c) all University governors, students, and staff, including temporary workers, regardless of their location or role.

4. POLICY STATEMENT

4.1 Western Caspian University is dedicated to conducting its operations with honesty and integrity. The university has a strict policy of zero tolerance for bribery and corruption, and is committed to fair and ethical conduct in all business dealings and relationships. High standards of ethics and values

are maintained across all university activities, including research, teaching, governance, and financial transactions.

4.2 Compliance with legal requirements regarding bribery and corruption is not just a cultural commitment, but a legal obligation that the university takes seriously.

4.3 The university will continue to uphold all laws against bribery and corruption in all jurisdictions in which it operates.

5. DEFINITION OF BRIBERY

Bribery refers to the offering, giving, receiving, or soliciting of any item of value, such as money, gifts, or favors, with the intent to unduly influence the decisions or actions of individuals within the institution.

Examples:

Offering a bribe involves giving or promising something of value to someone in exchange for them doing something in your favor, often to gain an unfair advantage. If you offer money to a professor in exchange for a higher grade, that would be considered offering a bribe.

Receiving a bribe is when someone accepts or agrees to accept something of value in exchange for doing something they shouldn't, such as making a decision that benefits the briber.

If a university administrator accepts money from a contractor to award them a construction project, that would be receiving a bribe.

Bribing a foreign official is giving them something valuable to get special treatment or favors.

You offer to pay a foreign government official to secure a permit for opening a new campus abroad. This act constitutes bribery of a foreign official because it aims to gain a commercial advantage for the university.

5.1 Facilitation payments

5.1.1 The University strictly prohibits facilitation payments of any kind, recognizing them as a form of bribery. Facilitation payments involve expediting routine governmental actions, such as processing licenses or permits, and are typically requested by low-level officials to speed up their duties. The University is committed to conducting its operations ethically and in compliance with anti-bribery laws and regulations.

5.1.2 The University prohibits the offering or acceptance of kickbacks, which are generally given in exchange for a business favor or advantage.

5.2 Donations to charitable causes

a) The University accepts (and indeed encourages) charitable giving, whether through services, knowledge, time, or direct financial contributions (monetary or otherwise), and agrees to disclose all charitable contributions it makes

b) Persons covered by this policy must ensure that charitable

c) contributions are not used to facilitate or conceal bribery

d) The University ensures that all charitable donations are legal and ethical, complying with local laws and practices.

6. RESPONSIBILITIES

6.1 All members of staff must read and adhere strictly to the guidelines contained in this policy. University employees will be required to comply with this policy, and with any training or other anti-bribery and corruption information provided by the University from time to time.

6.2 Employees who suspect or believe that a bribery or corruption incident has occurred, or will occur, in violation of this policy, should inform the Secretary to the Council.

Employees are responsible for preventing, detecting, and reporting bribery and corruption. They must avoid any activities that could suggest a breach of this policy.

7. RAISING A CONCERN

7.1 If you suspect that bribery or corruption has occurred in connection with business conducted by the University, you should raise your concerns as soon as possible.

7.2 If you are unsure whether a matter is bribery, consult this Policy and, if it is appropriate in the first instance, speak to Department of Legal Affairs

7.3 You must tell Department of Legal Affairs as soon as possible:

a) if you are offered a bribe by anyone

b) if you are asked to make one

c) if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity

7.4 The University understands that you may feel worried about potential repercussions in case of refusing to accept or offering a bribing or reporting a concerning relation to potential act of bribery or corruption. The University will provide support to individuals who raise concerns in good faith under this policy, even if subsequent investigations show their concerns were unfounded.

7.5 The University will prevent any form of negative treatment towards individuals who refuse to participate in bribery, report concerns, or are involved in related investigations. Detrimental treatment includes dismissal, disciplinary action, threats, or any unfavorable treatment related to the reported concern. If you have reasons to believe you have been unfairly treated due to a concern or refusal to accept a bribe, you should immediately inform Department of Legal Affairs.

8. MONITORING AND REVIEWING

8.1 Department of Legal Affairs and Quality Assurance Department are responsible for monitoring the effectiveness of this policy and will regularly review its implementation and assess its relevance, adequacy and effectiveness.

8.2 Any potential improvements will be implemented through the development of an updated policy as appropriate and further training as necessary.

8.3 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

8.4 Employees may raise concerns at any time to the Secretary to Council or by using the University's then-current whistleblowing procedures.

8.5 Internal control systems and procedures aimed at preventing bribery and corruption are regularly audited to verify their effectiveness in practice.

8.6 Employees are encouraged to report any concerns by contacting Department of Legal Affairs.