

POLICY DOCUMENT

ANTI-BRIBERY AND CORRUPTION POLICY

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01

Document Information

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02

Purpose:

The primary objective of this policy is to establish a systematic, transparent, and sustainable governance framework aimed at preventing bribery and corruption at Mingachevir State University. The policy seeks to strengthen the principles of integrity, ethical conduct, legal compliance, and public accountability across all areas of university activity, ensuring that these principles become an integral part of daily operations.

Through this document, a zero-tolerance approach to corruption is institutionalized, and clear, understandable, and enforceable standards of conduct are defined for all staff, students, partners, and other stakeholders. The objective is not only to prevent legal violations but also to promote an ethical culture, encourage responsible behavior, and enhance transparency and evidence-based decision-making processes.

The policy encompasses the early identification and management of bribery and corruption risks, the protection of objectivity and fairness in academic and administrative activities, and the strengthening of transparency and oversight in financial and procurement processes. It also addresses the prevention and proper management of conflicts of interest, promotes compliance with ethical standards, and ensures effective monitoring, internal control, audit, and accountability mechanisms are continuously enhanced.



Transparency, integrity, and public trust are fundamental values in the operation of higher education institutions. In this regard, Mingachevir State University places strong emphasis on maintaining high ethical standards in both governance and academic activities and demonstrates a firm stance against all forms of bribery and corruption. This policy has been developed to establish a sound governance environment within the university and to ensure the systematic management of potential risks, while aligning institutional practices with both national legislation and international best practices.

In the modern context, corruption risks are not limited to financial transactions; they may also arise in areas such as teaching and assessment processes, recruitment, project implementation, and relations with partners. Therefore, the university adopts a unified and preventive approach, focusing on the early identification and mitigation of such risks. Strengthening awareness among staff and students, improving internal control mechanisms, and ensuring transparency, accountability, and traceability in all processes are key components of this approach.

Through this policy, Mingachevir State University aims not only to strengthen internal discipline but also to enhance its position as a responsible, transparent, and trustworthy higher education institution. The effective implementation of this policy relies on the active participation and ethical responsibility of all staff and students, contributing to the development of a sustainable, fair, and integrity-driven institutional environment.



Corruption and Bribery: At Mingachevir State University, corruption refers to the misuse of official authority for personal gain, while bribery involves offering or accepting any benefit to influence decisions.



Conflict of Interest: A situation where personal interests conflict with official duties and may affect objective decision-making.



Ethical Conduct and Gift Policy: Acting in accordance with principles of integrity, responsibility, and fairness, while ensuring that gifts do not influence decisions.



Transparency and Accountability: Ensuring that activities are open, traceable, and that individuals take responsibility for their actions.



Internal Control and Whistleblowing: A system of control mechanisms to prevent violations and enable the safe reporting of unethical behavior.

Scope of Application

Ethical conduct principles at Mingachevir State University encompass all aspects of university life and are applied across the entire system of relationships, from leadership to staff, academic personnel, students, and external partners. In leadership–staff relations, it is essential that managers adhere to objective, transparent, and fair management principles, demonstrate impartiality in decision-making, and prevent any form of psychological pressure in the workplace. At the same time, employees are expected to fulfill their duties responsibly, complete assiThe Anti-Bribery and Anti-Corruption Policy at Mingachevir State University applies to all areas of the university's operations and is implemented across every process carried out within the institution. This approach extends beyond administrative and financial domains to fully encompass all aspects of the academic environment.

The policy primarily applies to teaching and assessment processes, ensuring that student evaluation, examination procedures, and academic decisions are conducted with objectivity and fairness. It also governs human resource management, where recruitment, promotion, and performance evaluation are based on transparency, merit, and equal opportunity, free from personal influence or informal interference.

In addition, the policy covers financial management and procurement activities, where strict transparency and control mechanisms are applied to minimize corruption risks. It also extends to research and project implementation, requiring objectivity and ethical compliance in grant allocation, project selection, and evaluation processes. Furthermore, all partnerships and stakeholder interactions are conducted in line with transparency, fairness, and mutual trust, ensuring that no form of discrimination, undue advantage, or unethical influence is tolerated.

Core Principles

Legal Compliance

All activities at Mingachevir State University are conducted in accordance with applicable laws, ensuring institutional reliability and compliance.

Zero Tolerance

A strict stance is applied against bribery and corruption, and any violation is addressed immediately and decisively.

Transparency and Accountability

Decisions are made in an open and traceable manner, with individuals taking responsibility and providing accountability for their actions.

Fairness

Equal and impartial treatment is ensured for all, and any form of discrimination or subjective decision-making is not tolerated.

Conflict of Interest

Personal interests must not influence decisions; such situations must be disclosed and properly managed.

Control and Trust

Internal control mechanisms ensure compliance with rules, while open communication and trust strengthen ethical behavior.

Strategic Objectives

Corruption Risk Identification and Management



Systematic identification, assessment, and continuous monitoring of corruption risks to enable early detection and effective mitigation.

Strengthening Internal Control and Audit



Enhancing internal control and audit mechanisms to ensure regular review of academic, administrative, and financial processes, improving transparency and governance quality.

Digitalization and Ethical Culture Development



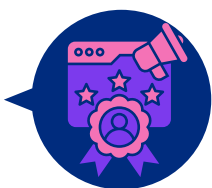
Expanding electronic governance systems to reduce human-related risks and ensure traceability, while promoting ethical values through continuous awareness and training.

Effective Reporting and Conflict of Interest Management



Establishing secure and accessible reporting mechanisms, ensuring proper management and prevention of conflicts of interest, and maintaining objectivity in decision-making.

Institutional Reputation and Public Trust



Strengthening transparent and accountable governance to protect the university's reputation and enhance public trust, supporting long-term sustainable development.

Key Performance Indicators (KPIs)

Objective	Indicator (KPI)	Baseline (2024)	Target (2027)	Timeline	Responsible Unit
Strengthening anti-corruption awareness among staff	Share of staff trained in anti-corruption (%)	72%	90%	2024–2027	Human Resources Department / Quality Assurance and Sustainable Development Department
Increasing student awareness on ethics and anti-corruption	Share of students informed (%)	68%	85%	2024–2027	Student Affairs Department / Internship and Career Department
Improving response effectiveness	Share of investigated and resolved reports (%)	84%	98%	2024–2027	Internal Audit Department
Reducing corruption cases	Confirmed corruption cases (number)	6	-40% (\approx 3–4)	2024–2027	Ethics and Disciplinary Committee / Internal Audit Department
Strengthening conflict of interest management	Share of staff submitting declarations (%)	35%	90%	2024–2027	Human Resources Department / Internal Audit Department
Ensuring transparent procurement	Share of e-procurement (%)	90%	100%	2024–2027	Finance and Supply Department / Digital Transformation Department

Implementation Mechanism

The effective implementation of the Anti-Bribery and Anti-Corruption Policy at Mingachevir State University is ensured through systematic and coordinated execution mechanisms. These mechanisms are designed to integrate the policy into daily operations and ensure that it delivers measurable and practical outcomes rather than remaining a formal document.

A clear functional distribution of responsibilities is established among relevant structural units. The Internal Audit Department leads risk assessment, monitoring, and control activities, while the Human Resources Department oversees ethical compliance, conflict of interest declarations, and staff awareness. The Quality Assurance and Accreditation Department evaluates overall implementation and supports continuous improvement of the policy.

Awareness and training activities constitute a key component of implementation. Regular training sessions for staff and students focus on ethical conduct, corruption risks, and prevention strategies, ensuring that all stakeholders understand and apply the policy in practice. In parallel, secure and accessible reporting mechanisms are established, allowing individuals to report suspected violations confidentially, with all cases properly registered, investigated, and addressed.

The implementation process is further strengthened through internal audits, digital tools, and continuous monitoring. Regular inspections in high-risk areas, the use of electronic systems for transparency and control, and KPI-based evaluations ensure accountability and effectiveness. This comprehensive approach enables the policy to function as a dynamic management tool, contributing to strong governance and sustainable institutional development.

10

Governance and Responsibilities

Structure / Role	Responsibilities
Rector	Ensures approval and overall oversight of the anti-bribery and anti-corruption policy; leads the implementation of the “zero tolerance” approach; coordinates between structural units and ensures high-level review of reports.
Academic Council	Approves strategic directions of the policy; regularly reviews implementation results; participates in decision-making on ethical and corruption risks.
Internal Audit Department	Conducts corruption risk assessments; organizes audits and inspections; investigates reported cases; prepares recommendations and reports to leadership.
Human Resources Department	Ensures transparency in recruitment, evaluation, and career development; manages conflict of interest declarations; organizes training on ethics and anti-corruption.
Ethics and Disciplinary Committee	Investigates ethical and corruption-related cases; makes decisions; recommends disciplinary actions; oversees compliance with ethical standards.
Finance and Supply Department	Ensures transparency in financial operations and procurement processes; monitors efficient use of resources; implements measures to reduce financial risks.

11

Monitoring and Evaluation

The effectiveness of the Anti-Bribery and Anti-Corruption Policy at Mingachevir State University is ensured through continuous monitoring and systematic evaluation of its implementation. This process is not treated as a formal review but as an ongoing mechanism used to measure real performance and improve management decision-making. Monitoring is primarily conducted based on predefined Key Performance Indicators (KPIs), including

awareness levels among staff and students, the number and resolution rate of reported cases, trends in confirmed corruption incidents, the level of conflict of interest declarations, and transparency indicators in procurement and financial processes. These indicators provide not only statistical insights but also help identify areas with higher risk exposure.

Data collection is carried out through multiple sources. The Internal Audit Department provides audit and inspection results, the Documentation and Appeals Department compiles statistics on incoming complaints, the Human Resources Department tracks training and ethical compliance indicators, and the Finance and Supply Department reports on procurement and financial activities. These data are consolidated on a periodic basis—quarterly and annually—and used for comprehensive evaluation. The assessment process goes beyond numerical comparison, focusing on trend analysis, identifying root causes, and detecting systemic weaknesses. For instance, an increase in reported cases may indicate improved trust in reporting mechanisms rather than a rise in corruption risks. Monitoring results are regularly reported to university leadership and relevant structural units. Based on these findings, additional control measures may be introduced, training programs expanded, and procedures revised where necessary. At the same time, transparency is maintained by sharing summarized results with the university community, strengthening trust and encouraging broader stakeholder engagement. Through this approach, the policy functions as a dynamic and continuously improving management tool, ensuring the development of a transparent, accountable, and ethically grounded institutional environment.

Stakeholder Engagement

The effective implementation of the Anti-Bribery and Anti-Corruption Policy at Mingachevir State University is supported not only internally but also through its relationships with external stakeholders. The university extends its commitment to transparency and ethical conduct beyond its internal environment, applying the same principles in all forms of external cooperation and partnerships.

Collaboration with government institutions plays a particularly important role in this context. Through information exchange, methodological support, and alignment with national legislation, these partnerships contribute to reducing corruption risks and strengthening accountability. At the same time, cooperation with the private sector and business organizations is guided by clear and transparent selection criteria, with strong emphasis on integrity, reputation, and compliance with ethical standards in joint projects and activities.

Engagement with international organizations and higher education institutions enables the adoption of best practices and alignment with global ethical standards. Academic exchange programs, joint research initiatives, and institutional development projects are all conducted in accordance with internationally recognized principles of integrity and transparency. In addition, student organizations and alumni contribute to awareness-raising and feedback processes, helping to strengthen ethical culture and improve institutional practices.

As a result, partnerships established by the university are not limited to operational collaboration but also promote a shared commitment to ethical values, responsibility, and trust.

13

Alignment with Sustainable Development Goals

This policy is closely aligned with **SDG 16** - Peace, Justice and Strong Institutions, promoting transparency, accountability, and a zero-tolerance approach to corruption. By strengthening internal control mechanisms and ensuring fair and transparent decision-making, it contributes to the development of effective and trustworthy institutions.

At the same time, the policy supports **SDG 8** - Decent Work and Economic Growth by ensuring transparent recruitment, fair career development, and ethical management practices, which foster a healthy and professional working environment.

It is also indirectly connected to **SDG 17** - Partnerships for the Goals, as the university's commitment to transparency and trust in cooperation with public, private, and international partners supports the development of sustainable and reliable partnerships.

Evidence and Reporting

The effectiveness of the Anti-Bribery and Anti-Corruption Policy is measured not only by its adoption but by the demonstration of tangible results and their regular reporting. At Mingachevir State University, this approach is an integral part of governance, grounded in transparency and evidence-based decision-making across all activities.

All data generated through policy implementation serves as a structured evidence base. This includes records of training activities and participation rates, conflict of interest declarations, incoming reports and their investigation outcomes, internal audit findings, and documentation related to financial and procurement processes. These data are systematically collected, documented, and maintained for verification and review when necessary.

Within the accountability framework, relevant structural units provide regular reports aligned with their responsibilities. The Internal Audit Department consolidates findings from inspections and investigations, the Human Resources Department tracks ethics-related indicators and training outcomes, and the Finance and Supply Department reports on the transparency of financial operations. These inputs are periodically integrated and submitted to leadership to inform decision-making.

The reports go beyond statistical data, incorporating analysis of current conditions, identified risks, and areas for improvement. In line with transparency principles, selected aggregated information is shared with the university community to strengthen trust, while ensuring confidentiality and data protection. This comprehensive approach ensures that the policy remains a practical, continuously improving tool that reinforces responsible, transparent, and accountable governance within the university.