



BAKI ALI NEFT MƏKTƏBİ BAKU HIGHER OIL SCHOOL

Antibribery and corruption policy

CONTENT

- 1. Purpose**
- 2. Scope**
- 3. Principles**
- 4. Responsibilities and Procedures**
- 5. Compliance and Oversight**
- 6. Training and Awareness**
- 7. Policy Review**
- 8. Enforcement**

1. Purpose

To establish clear guidelines and procedures that prevent corruption and bribery within all operations and relationships associated with BHOS.

2. Scope

Applicable to all faculty, staff, students, contractors, partners, and any individuals directly or indirectly associated with BHOS.

3. Principles

- **Zero Tolerance:** Firmly establish a zero-tolerance policy towards bribery, corruption, and unethical behavior at all levels of the organization.
- **Compliance with Laws:** Commit to complying with all applicable anti-bribery laws and regulations in every jurisdiction where the organization operates.
- **Ethical Conduct:** Promote a culture of honesty, integrity, and transparency throughout the organization, where employees are encouraged to report any suspicions of bribery or corruption without fear of retaliation.
- **Risk Assessment:** Conduct regular risk assessments to identify and evaluate potential bribery risks associated with the organization's operations, business partners, and markets.
- **Due Diligence:** Implement robust due diligence procedures for assessing the integrity and reputation of third parties, including suppliers, agents, distributors, and business partners.
- **Training and Awareness:** Provide comprehensive training and awareness programs to educate employees and relevant stakeholders about the organization's anti-bribery policies, procedures, and legal obligations.
- **Reporting Mechanisms:** Establish confidential reporting mechanisms, such as hotlines or whistleblowing procedures, to enable employees and stakeholders to report suspected instances of bribery or corruption anonymously.
- **Enforcement and Accountability:** Enforce strict disciplinary actions against individuals or entities found to have engaged in bribery or corruption, regardless of their position or seniority within the organization.
- **Monitoring and Review:** Implement regular monitoring and review mechanisms to assess the effectiveness of the anti-bribery policy, identify areas for improvement, and ensure ongoing compliance with anti-bribery laws and regulations.
- **Continuous Improvement:** Commit to continuous improvement by regularly reviewing and updating the anti-bribery policy and related procedures in response to changes in the organization's operations, industry best practices, and evolving legal requirements.

4. Responsibilities

Management

Ensure Policy Communication and Understanding: Guarantee that the anti-corruption and bribery policy is disseminated and comprehended across BHOS, including the importance of the reporting mechanism.

Training and Enforcement: Provide ongoing training on the policy and its application, including how to use the reporting mechanism. Monitor compliance and enforce the policy through appropriate measures.

Investigation Oversight: Oversee the investigation of reports of corruption or bribery and ensure that they are handled promptly, fairly, and confidentially.

Employees and Associates

Compliance: Adhere to the anti-corruption and bribery policy in all activities related to BHOS. This includes understanding the reporting mechanism and how it should be used.

Reporting Suspected Breaches: Use the established reporting mechanism to confidentially report any suspected incidents of corruption or bribery, whether witnessed directly or through credible information.

Cooperation: Assist in any investigations by providing accurate information and supporting the process to address corruption and bribery.

5. Procedures

- **Prohibited Conduct**

The following actions are strictly prohibited under this policy:

Offering, promising, giving, or accepting bribes or kickbacks, whether in cash or in kind, to any person or entity, including government officials, to gain an improper business advantage.

Making facilitation payments to expedite routine government actions.

Engaging in any form of extortion, coercion, or blackmail.

Participating in any scheme to launder money or conceal the proceeds of bribery or corruption.

Improperly recording or concealing transactions to facilitate bribery or corruption.

Engaging in any other behavior that could be construed as bribery or corruption.

- **Gifts, Hospitality, and Entertainment**

While business gifts, hospitality, and entertainment are common and legitimate business practices, they must be given and received transparently and in compliance with applicable laws and regulations. Employees must exercise discretion and good judgment when giving or receiving

gifts, hospitality, or entertainment to ensure that they do not create the appearance of impropriety or influence.

- **Reporting and Whistleblowing**

Employees who become aware of any actual or suspected violation of this policy must report it immediately to their manager, Human Resources, or the Compliance Officer. BHOS encourages open communication and whistleblowing in good faith and will not tolerate any form of retaliation against individuals who report violations of this policy.

6. Compliance and Oversight

BHOS is committed to complying with all applicable anti-bribery and corruption laws and regulations in the jurisdictions where we operate including the internally accepted rules and guidelines of SOCAR' and any other relevant legislation.

7. Training and Awareness

BHOS will provide regular training and awareness programs to ensure that all employees and relevant stakeholders understand their obligations under this policy and are equipped to identify and prevent bribery and corruption in their daily activities.

8. Enforcement

Violations of this policy will result in disciplinary action, up to and including termination of employment or contractual relationship, and may also result in legal action and civil or criminal penalties for individuals involved. BHOS reserves the right to report suspected violations to the appropriate authorities for investigation and prosecution.

9. Policy Review

This policy will be reviewed periodically to ensure its effectiveness and relevance in preventing bribery and corruption within BHOS. Any updates or amendments to this policy will be communicated to all relevant stakeholders in a timely manner.