Khazar University

Human Rights, Modern Slavery and Ethical Conduct Policy

Contents

1. Purpose

2. Scope

3. University Commitments

4. Governance, Roles and Responsibilities

5. Awareness

6. Reporting

7. Responsible Procurement and Supply Chain Due Diligence

8. Alignment with International Frameworks

9. Monitoring and Review

Category: Ethics

Effective Date: 2024

Applicability: University-wide

First approved: 2024

Version number: 2

Revised: 2026

1. Purpose

1.1 Khazar University is committed to upholding the highest ethical, legal, and professional standards in all aspects of its academic, research, administrative, and operational activities. The University maintains zero tolerance toward modern slavery, human trafficking, forced labor, and any form of exploitation. This commitment applies across all University operations, academic and administrative units, research activities, international collaborations, campus services, procurement processes, and supply chain relationships.

1.2 Through this policy, Khazar University defines its institutional responsibilities, sets clear expectations for staff, students, suppliers, contractors, and partners, and establishes preventive, monitoring, and responsive measures for identifying, mitigating, and eliminating risks related to modern slavery. The policy provides a framework for awareness-raising, ethical employment practices, responsible sourcing, and transparent reporting mechanisms, ensuring that the University's activities do not directly or indirectly contribute to exploitation or human rights violations.

1.3 Modern slavery encompasses a range of exploitative practices, including forced labor, human trafficking, debt bondage, child labor, involuntary domestic work, and the exploitation of vulnerable individuals. These practices constitute serious violations of fundamental human rights and are prohibited under international conventions established by the International Labor Organization, the United Nations and the Council of Europe.

2. Scope

This policy applies to:

- All academic and administrative units
- All full-time, part-time, and contract employees
- Students
- Suppliers, contractors, and service providers
- Partner universities, research collaborators, and international projects

3. University Commitments

3.1 Khazar University upholds a zero-tolerance approach to modern slavery, human trafficking, and all related forms of exploitation across its academic, administrative, research, and operational activities.

3.2 The University is committed to fostering a safe, fair, and ethical environment for all members of its community, as well as for individuals engaged through its supply chains, partnerships, and collaborative projects.

3.3 The University ensures that:

- All staff are employed voluntarily and in accordance with the Labor Code of the Republic of Azerbaijan;
- Employment contracts are transparent, fair, and accessible;
- No recruitment or placement fees are charged to employees at any stage of employment;
- Employees retain full freedom of movement, association, and resignation;
- Working conditions comply with national labor standards and align with internationally recognized best practices.

3.4 Khazar University recognizes that students may be particularly vulnerable to exploitation. The University strictly prohibits unpaid or forced student work, coercive or compulsory internship arrangements, and any form of exploitation targeting international students, minorities, or other vulnerable groups. All student work-related activities must be voluntary, transparent, educational in purpose, and compliant with relevant academic regulations.

3.5 All research conducted under the auspices of Khazar University must adhere to ethical standards, including respect for human rights, informed consent, and the protection of dignity and personal data. Researchers are expected to avoid collaborations with individuals or organizations implicated in exploitative practices. Research involving fieldwork in vulnerable or at-risk communities must be designed and implemented with appropriate safeguards and, where applicable, approved by the University's Ethics Committee.

3.6 Khazar University shall aim to ensure that every staff member and faculty employee receives at least the applicable living-wage benchmark, in addition to meeting statutory minimum-wage requirements. Where no officially defined local living wage exists, the University shall use a documented benchmark based on the published local subsistence or poverty indicator for a family of four, converted into an hourly rate using a consistent standard working-hours basis. Human Resources and Finance shall review individual rates against the annual benchmark and propose corrections for identified shortfalls.

3.7 The University shall apply fair and transparent pay criteria and equal pay for the same or work of equal value, irrespective of gender. Human Resources and Finance shall measure gender pay gaps at least annually, including comparisons of relevant hourly pay within comparable roles or grades. Unjustified differences shall be investigated and addressed through documented corrective measures, with confidential records and aggregated reporting.

3.8 The University recognises the right of all eligible employees, including women and international academic and administrative staff, to associate freely, engage in lawful collective representation and participate in collective bargaining in accordance with Azerbaijani legislation. Employees shall not face discrimination or retaliation for exercising these rights.

3.9 Khazar University recognises the right of employees, including women and international staff, to establish or join trade unions voluntarily without prior employer permission where provided by law. The University shall respect the independence of lawfully constituted unions and engage with authorised employee or union representatives in collective negotiations in accordance with the Labor Code. This provision does not assert that a union or collective agreement currently exists at the University.

Through these commitments, Khazar University reinforces its dedication to human rights, ethical governance, and responsible institutional conduct.

4. Governance, Roles and Responsibilities

4.1 The effective implementation of this policy is supported by a shared governance framework:

- The Ombudsman's Office provides confidential, impartial informal guidance on human rights concerns and may assist with voluntary referrals; it does not conduct formal investigations or impose disciplinary measures.
- The Ethics Committee handles formal reports and investigations within its approved mandate; decisions on disciplinary sanctions rest with the competent University authority.
- Human Resources Department ensures ethical recruitment, transparent employment practices, and staff awareness.
- Procurement and Finance Departments integrate modern slavery considerations into supplier selection, contracting, and risk assessment processes.
- Academic Departments and Research Centers ensure ethical conduct in teaching, research, and international collaborations.
- Senior Management holds ultimate responsibility for institutional compliance with this policy.

5. Awareness

5.1 The University undertakes awareness-raising activities to ensure that all members of its community understand their role in preventing modern slavery and human trafficking. These activities include:

- Targeted training for Human Resources and relevant administrative staff on ethical recruitment and employment practices;
- Awareness sessions for faculty, researchers, and students to help identify indicators of exploitation and understand ethical responsibilities in academic, research, and project-based activities;
- Publication of this policy on the University's official website and internal communication platforms;

- Annual reminders highlighting reporting mechanisms, staff responsibilities, and updates to relevant legislation or institutional procedures.

5.2 These measures collectively support a culture of vigilance, transparency, and informed action across the University.

6. Reporting

6.1 Any member of staff, student, supplier, or partner may report suspected or actual cases of modern slavery or exploitation through the following channels:

- Human Resources Department
- University Ombudsman's Office (https://khazar.org/en/item/10118)
- Ethics Committee through the University's approved formal reporting procedure

6.2 All reports will be handled confidentially and in good faith. The University guarantees that no individual will face retaliation, discrimination, or disadvantage for raising concern or participating in an investigation. Reports may be submitted anonymously.

6.3 Reported cases will be reviewed in accordance with the University's ethical and disciplinary frameworks. Appropriate corrective actions will be taken if violations are identified.

6.4 Consultation with the Ombudsman is informal and does not by itself initiate a formal investigation. Individuals may submit a formal report directly to the Ethics Committee or the competent University authority without first approaching the Ombudsman.

7. Responsible Procurement and Supply Chain Due Diligence

7.1 Khazar University is committed to promoting ethical and responsible practices throughout its supply chains. The University integrates modern slavery risk considerations into procurement and contracting processes by:

- Conducting risk-based assessments of suppliers and contractors;
- Requiring suppliers to adhere to ethical standards consistent with this policy;
- Reserving the right to terminate contracts in cases of confirmed violations.

8. Alignment with International Frameworks

8.1 This policy aligns with and supports internationally recognized standards and principles, including:

- United Nations Sustainable Development Goals (SDG 8: Decent Work and Economic Growth; SDG 16: Peace, Justice and Strong Institutions);
- UN Guiding Principles on Business and Human Rights;
- International Labor Organization Conventions on Forced Labor and Child Labor;
- Council of Europe standards on the prevention of human trafficking and exploitation.

8.2 The provisions on labour rights, trade unions, collective bargaining and equitable remuneration shall be implemented in accordance with the Labor Code of the Republic of Azerbaijan, including Articles 19, 25 and 154, and applicable amendments concerning equal pay for work of equal value.

9. Monitoring and Review

9.1 The implementation of this policy is subject to periodic monitoring.

9.2 The policy will be reviewed at least once every three years, or earlier if required due to legislative changes, institutional developments, or identified risks.

9.3 Human Resources and Finance shall document the annual living-wage reference, its calculation and the share of employees meeting the resulting hourly threshold; review gender pay gaps and agreed actions to eliminate unjustified disparities; and record relevant engagement with employee representatives. Aggregate results shall be reported internally without identifying individual salaries. Policy commitments shall not be presented as completed performance outcomes without supporting records.