



AMCHAM

AMERICAN CHAMBER OF
COMMERCE IN AZERBAIJAN



AMCHAM AZERBAIJAN BUSINESS CODE OF CONDUCT



American Chamber of
Commerce in Azerbaijan

Baku - 2023

AmCham Azerbaijan Business Code of Conduct

Our Mission

Our mission is to promote the business interests of our Member Companies by providing high-quality services to them as well as by working on the improvement of the business climate in Azerbaijan.

To achieve that goal, we have outlined the AmCham Azerbaijan Business Code of Conduct, for building a sustainable culture of integrity and an environment which is openly embraced by our stakeholders.

Who should follow this Business Code of Conduct

AmCham Azerbaijan Business Code of Conduct must be followed by member companies, suppliers, agents, and anyone who represents and works for AmCham Azerbaijan.

Anti-Bribery & Corruption (ABC)

At AmCham Azerbaijan, we do not tolerate bribery or corruption of any kind. It is prohibited directly or indirectly offering, promising, giving, asking, soliciting or accepting anything of value for the purpose of winning or retaining business or to gain an unfair business advantage. Anything of value may include, gifts, meals, travel/entertainment, employment/internships, charitable contributions and sponsorships, and can also include a mere promise or guarantee of something of value.

AmCham Azerbaijan must comply with all applicable anti-bribery and anti-corruption laws, including the relevant legislation of the Republic of Azerbaijan.

AmCham Azerbaijan is committed to the following:

1. Prohibiting bribes of any kind;
2. Maintaining reasonable internal controls; and
3. Keeping accurate books and records.

Conflicts of Interest

Our decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence.

A conflict of interest occurs when an individual's private interest, directly or indirectly, interferes or appears to interfere with the interests of the organization.

Conflicts of interest could arise:

- Being employed (you or a close family member) by an actual or potential customer, competitor, supplier or contractor.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for another organization.
- Owning or having a financial interest in a customer, competitor, supplier, or contractor.
- Having a personal, financial interest or potential personal gain in any company transaction.

You have a duty to disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward AmCham Azerbaijan.

Any conflict of interest should be reported to the Board of Directors of AmCham Azerbaijan.

No activity at work should harm the reputation or good name of our organization.

A conflict of interest is not necessarily a violation, but failing to promptly disclose a conflict is always a violation.

Gifts and Entertainment

Gifts and entertainment are a common and acceptable way to strengthen business relationships, but they can also create an appearance of unfair dealings or even be considered bribes. Giving and receiving gifts and providing and receiving entertainment can also affect independence of judgment in business dealings.

We will neither give nor accept such benefits that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation, or policies.

All Gifts and Entertainment (given and received) must be:

1. Reasonable (not extravagant or inappropriate based on customary industry and local standards).
2. Appropriate (not adult entertainment).
3. For a bona fide business purpose.
4. Infrequent.
5. Not create an appearance of impropriety (e.g., not be construed as a bribe or as an attempt to gain an unfair business advantage).
6. Compliant with the recipient's organization's policies and country's laws.
7. Non-cash.

Cyber Security and Data Privacy

We respect individuals' privacy rights, and we acknowledge members, employees and other persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose.

We are committed to complying with applicable data privacy and information security laws.

We only acquire and keep personal information that is necessary, and we do implement proper security measures to assure confidentiality and integrity of personal information.

Our staff must observe the legal requirements, apply compliant practices, and follow related procedures to ensure the legality of personal data handling and processing activities.

Proprietary information includes all non-public information that might be harmful to the organizations or its customers, and business partners if disclosed to unauthorized parties. All staff must handle any such information as secret.

Every rule ensuring information security must be followed at all times.

Intellectual Property

We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means.

At AmCham Azerbaijan, we value and respect the intellectual property rights of others and we expect our members, employees, and stakeholders to do the same. Our commitment to upholding intellectual property rights is fundamental to our integrity and reputation as a responsible organization.

- We will not use, reproduce, distribute, or share intellectual property (including patents, copyrights, trademarks, and trade secrets) belonging to others without proper authorization.
- We have a duty to protect and safeguard AmCham Azerbaijan's intellectual property, which includes but is not limited to software, designs, trademarks, and confidential information.
- Unauthorized sharing, distribution, or use of AmCham Azerbaijan's intellectual property is strictly prohibited and may result in disciplinary action, up to and including termination of employment or contractual relationship, as well as potential legal action if applicable.

By adhering to these guidelines, we uphold our commitment to respecting intellectual property rights, fostering innovation, and maintaining the trust of our members, stakeholders, clients, and the broader community.

Procurement Practices

The way in which businesses in Azerbaijan purchase goods and services could have a significant effect on improving the business climate in Azerbaijan. Similarly, it is important that business partners are chosen carefully so that commitment to this Code is not undermined.

We are dedicated to maintaining the highest standards of integrity, transparency, and fairness in our procurement practices. Our commitment to ethical procurement is essential to our reputation and our relationships with suppliers and other stakeholders.

Therefore, we will:

- Conduct all procurement activities in a fair, transparent and competitive manner, giving all qualified suppliers an equal opportunity to compete for our business.
- Base procurement decisions on objective criteria such as quality, cost, performance, and sustainability.

- Avoid conflicts of interest that could compromise the integrity of our procurement process.
- Strive to establish long-term, mutually beneficial relationships with our suppliers, promoting fairness and reliability.

Health, Safety and Environment

We will conduct the business in a manner that avoids harm to people and respects the environment.

Healthy workers and safe and secure workplaces lead to improved productivity. Minimizing damage to the environment is an important part of AmCham Azerbaijan's corporate social responsibility. Providing safe and secure workplaces, responsibly using natural resources, and reducing waste are all ways that Members and Associates can help to improve the business climate in Azerbaijan.

Therefore, the Members and Associates of AmCham Azerbaijan shall give primary importance to matters involving the health, safety and security of their employees and others while carrying out their businesses.

Also, we are dedicated:

- To minimizing our environmental footprint and will comply with all applicable environmental laws and regulations.
- To putting efforts to reduce waste, conserve resources and use sustainable practices are encouraged in all aspects of our business.
- To delivering products and services that meet or exceed safety standards, ensuring the well-being of our members, stakeholders and the public.

By adhering to these principles, we demonstrate our commitment to safeguarding the health and safety of our employees, members and the environment while maintaining the trust and confidence of all stakeholders.

Government Relations

At AmCham Azerbaijan we are committed to conduct our interactions with government entities, officials and political activities with the utmost integrity, transparency, and compliance. Our engagement in government relations activities is guided by ethical principles and commitment to the law.

In our interactions with Government Bodies:

- We will comply with all applicable laws, regulations and guidelines related to lobbying, political contributions, and interactions with government officials.
- We will not make false or misleading statements and we will not attempt to unduly influence government decisions through deceptive means.

By adhering to these guidelines, we uphold our commitment to ethical government relations practices, ensuring transparency, accountability, and fairness in all our interactions with government entities and officials.

Employment Practices and Harassment

AmCham Azerbaijan is fostering an environment that is inclusive, respectful and free from discrimination and harassment.

We believe in treating everyone with dignity and providing equal opportunities for all, regardless of race, gender, sexual orientation, religion, nationality, disability, or any other protected status.

- Members and Associates of AmCham Azerbaijan will seek to eradicate harassment and discrimination on the grounds of nationality, race, religion, age, color, sex, handicap and any other form of discrimination (except as may be provided for in law) from the workplace.
- Harassment in any form, including but not limited to verbal, physical, visual or written harassment, is unacceptable. This includes harassment by employees, members,

- suppliers or any other individuals associated with the AmCham Azerbaijan.
- Our members, stakeholders and employees who experience or witness harassment are encouraged to report it immediately to the Board of AmCham Azerbaijan.

Violation of this Employment Practices and Harassment section of the Code of Conduct may result in disciplinary action, up to and including termination of employment or contractual relationship, as well as potential legal action if applicable.

By upholding these principles, we create a workplace environment where everyone is valued, respected, and empowered to contribute their best, fostering a culture of inclusivity and mutual respect.



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