



A High-Standard Institutional Framework Aligned with Global University Best Practices

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1. General Provisions

1.1 Purpose

1.1.1 The purpose of these Regulations is to align TSUULL's internal anti-corruption measures with the national framework established by the Law on Combating Corruption. The Law's purpose is to "regulate relations in the field of combating corruption."

1.1.2 These Regulations embed the principles of legality, transparency, and system-wide prevention that the national law mandates.

1.1.3 At TSUULL, these Regulations ensure that all staff, students, and third-party agents maintain integrity, report misconduct, and contribute to a culture of non-tolerance of corruption.

1.2 Principles

These Regulations apply, in part, the basic principles of the national Law:

- Legality: TSUULL's anti-corruption policies adhere strictly to the national law.
- Priority of rights: Protection of rights and legitimate interests of individuals within the University.
- Openness and transparency: Ensuring processes are transparent and documented, especially those involving potential corruption risk.
- Systemic prevention: Establishing preventive mechanisms within TSUULL to address corruption systematically.
- State–civil society cooperation: Encouraging student and staff participation in anti-corruption activities, aligning with the Law's requirement for interaction.
- Priority of prevention: Emphasizing preventive actions over reactive.
- Inevitability of responsibility: Misconduct will not go unpunished; TSUULL enforces sanctions consistent with national standards.

2. Institutional Responsibilities & Participation

2.1 Alignment with State Anti-Corruption Bodies

2.1.1 Under the national Law, the Anti-Corruption Agency (ACA) is responsible for developing and coordinating anti-corruption policy, including implementing state programs.

2.1.2 TSUULL pledges to cooperate with national bodies such as: the ACA, General Prosecutor's Office, Ministry of Justice, Internal Affairs, and others (all referenced as implementing bodies under the Law).

2.1.3 University-level anti-corruption functions (audit, ethics commissions) will coordinate with these state bodies where appropriate, especially in high-risk cases or investigations.

2.2 Participation by University Community

2.2.1 The national Law explicitly calls for civil society participation, including NGOs and citizens, in anti-corruption policy and oversight.

2.2.2 TSUULL's students, self-governance groups, and NGOs are formally recognized to contribute to policy review, conduct awareness-raising campaigns, and provide feedback on anti-corruption measures.

2.2.3 The University supports transparency by enabling reporting channels for all community members, in alignment with national mandates for openness.

3. Prevention, Risk Management, and Internal Controls

3.1 Legal Risk Assessment

3.1.1 According to the Law, one of the main directions of state policy is "the timely detection and suppression of corruption offenses, elimination of their causes and conditions."

3.1.2 TSUULL's internal risk assessments must therefore be structured around legal risk areas: gifts, third-party relationships, procurement, media interactions, and more.

3.1.3 Heads of departments must perform regular assessments and document both risk identification and mitigation plans.

3.2 Record-Keeping & Transparency

3.2.1 The national Law supports "openness and transparency" as core principles.

3.2.2 TSUULL must maintain detailed, accurate financial records, particularly for any third-party payments, contracts, or benefits exchanged.

3.2.3 All such records should be subject to internal audit, and irregularities should be escalated promptly.

3.3 Conflict of Interest Management

3.3.1 The Law defines "conflict of interest" and requires mechanisms to prevent and manage such conflicts.

3.3.2 TSUULL will institute a formal conflict-of-interest declaration process:

- All staff and key students (e.g., student leaders) must annually declare potential conflicts.
- A specialized ethics or compliance committee will review these declarations, recommend recusal, or impose other mitigating measures.
- 3.3.3 Violations or non-disclosure of conflicts will result in disciplinary measures in line with national law.

3.4 Preventive Programs & Education

3.4.1 The Law mandates state programs for corruption prevention.

3.4.2 TSUULL shall develop its own *Anti-Corruption Education Program*, including:

- Workshops, training, and webinars for staff and students;
- Integration of anti-corruption topics into curricula, especially in relevant departments (e.g., law, public administration);
- Awareness campaigns leveraging University media (newspapers, social media) to promote a culture of integrity.

4. Reporting, Investigation, and Protection

4.1 Reporting Mechanisms

4.1.1 In line with national law, TSUULL must maintain “secure, reliable, and confidential” reporting channels.

4.1.2 Reports of suspected corruption, bribery, or other suspicious activity should primarily be made to the University’s **Anti-Corruption Compliance-Control Department**, which is responsible for receiving, recording, and coordinating investigations.

4.1.3 Reports can be submitted anonymously or confidentially via:

- Direct communication with the Compliance-Control Department;
 - University-approved online channels;
 - Any member of the University Ethics Committee if the Compliance-Control Department is unavailable.
- 4.1.4 All reports should trigger a preliminary review by the Compliance-Control Department, and if necessary, be escalated to national authorities in accordance with the Law on Combating Corruption.

4.2 Whistleblower Protection

4.2.1 Under Uzbekistan’s anti-corruption law, individuals who report corruption, and their close relatives, are protected from retaliation.

4.2.2 TSUULL provides:

- Legal protection from retaliation (e.g., dismissal, harassment)
- Confidential handling of the reporter’s identity (unless legally required otherwise)
- Support services (psychological, legal) if necessary, for whistleblowers and their families

4.3 Investigation & Sanctions

4.3.1 The Compliance-Control Department coordinates investigations internally or with national law enforcement agencies when serious corruption is alleged.

4.3.2 Sanctions for confirmed corruption or bribery may include:

- Disciplinary action up to termination;
- Referral to prosecutors;
- Recovery of losses, if possible and appropriate;
- Publication of findings (while protecting sensitive details if required by law).

5. Monitoring, Reporting & State Coordination

5.1 Internal Monitoring

5.1.1 TSUULL will set up regular internal audits. These will align with national expectations for systemic prevention.

5.1.2 Audit reports should be reviewed by senior leadership and shared (in summary form) with the broader University community to strengthen transparency.

5.2 National-State Policy Alignment

5.2.1 According to the Law, the Anti-Corruption Agency coordinates ministries and state bodies in preventing corruption.

5.2.2 TSUULL pledges to contribute to national anti-corruption programs by:

- Participating in the development and implementation of state programs;
- Sharing best practices and risks identified at the University level;
- Reporting annually on its anti-corruption efforts for inclusion in national reviews.

5.3 Research & Reporting

5.3.1 TSUULL will periodically conduct research on corruption risks, leveraging its academic capacity. This aligns with the Law's goal to increase legal awareness and identify corruption conditions.

5.3.2 The University will produce an annual *Anti-Corruption Transparency Report*, summarizing:

- incidence of reported issues,
- how they were handled,
- improvements made,
- challenges ahead.

6. Final Provisions

6.1 Review & Update

6.1.1 These Regulations will be reviewed at least every two years to ensure alignment with updates in national legislation (e.g., amendments to the Law "On Combating Corruption").

6.1.2 Updates will be made in consultation with the University Council, faculty, student representatives, and national anti-corruption bodies.

6.2 Enforcement

6.2.1 These Regulations become effective immediately upon approval by the University Council.

6.2.2 All staff, students, and third-party representatives must formally acknowledge their understanding and acceptance of the anti-corruption rules.