



TSUULL ANTI-CORRUPTION POLICY

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TSUULL Anti-Corruption Policy

1. Introduction

At the Alsher Navo'i Tashkent State University of Uzbek Language and Literature (TSUULL), we are unwavering in our commitment to conducting all activities with the highest level of integrity. It is our steadfast policy that all staff and students engage in their roles with honesty and integrity, refraining from any involvement in corrupt practices or bribery to gain an unfair advantage. This commitment transcends cultural boundaries, as bribery constitutes a criminal offense in most jurisdictions. Acts of corruption not only expose the University and its members to legal repercussions but also jeopardize the institution's reputation. TSUULL has adopted this policy, and it is imperative that it is effectively communicated to all individuals associated with our organization to reinforce their unwavering commitment to it. Any breach of this policy will be treated with utmost seriousness and may result in disciplinary action.

2. Understanding Bribery and Corruption

Bribery is the act of offering, promising, giving, demanding, or accepting an advantage with the intention of inducing illegal, unethical, or dishonest actions or the improper execution of a contract. Corruption, on the other hand, entails the misuse of public office or power for personal gain or the improper use of private influence in non-governmental business activities. Acts of bribery or corruption are designed to sway individuals to act dishonestly in their roles. Those being bribed are often individuals who can influence, acquire, retain, or direct business. It is important to note that bribery can occur before or after the associated activity.

3. Identifying a Bribe

Bribes can manifest in various forms, typically involving corrupt intent and mutual benefit. A bribe may include:

The direct or indirect promise, offer, or authorization of valuable items.

The offer or receipt of kickbacks, loans, fees, rewards, gifts, or other advantages.

Providing aid, donations, or votes with the intention of exerting improper influence.

4. Perpetrators of Bribery and Corruption

The law recognizes that acts of bribery and corruption can be committed by:

University employees, officers, or directors.

Any individual acting on behalf of the University, including agents or third-party representatives (including students).

Entities or individuals authorizing others to carry out such acts. It is essential to note that acts of bribery or corruption may often involve government officials, which is a specific offense under the law.

5. Preventing Bribery and Corruption

To effectively prevent bribery and corruption, TSUULL is committed to taking the following steps:

A. Risk Assessment: Conduct thorough risk assessments, particularly for overseas activities, to identify vulnerabilities and discuss potential risks with the Director of Finance.

B. Accurate Record-Keeping: Maintain meticulous and accurate financial records for all activities and third-party representatives, as any form of inaccurate record-keeping can compromise the University's reputation.

C. Effective Monitoring and Internal Control: Implement robust monitoring and control systems, amending procedures as necessary to mitigate identified risks. Heads of Budget Centers bear the responsibility of conducting risk assessments, maintaining proper record-keeping, and monitoring activities to prevent bribery and corruption. They must also ensure that all staff members receive a copy of this policy.

7. Areas of Bribery and Corruption Risk

The following activities are areas where bribery and corruption risks are prevalent: *A. Engaging Third-Party Representatives:* Third-party representatives, including agents, distributors, consultants, and joint venture partners, must strictly adhere to this policy. Staff members are accountable for assessing each third-party relationship for specific risks, making third parties aware of this policy, and implementing enhanced controls as needed.

B. Gifts, Entertainment, and Hospitality: While gifts, entertainment, and hospitality are acceptable within reasonable bounds, they must not, under any circumstances, constitute bribes, regardless of size or local customs.

8. Reporting Concerns

At TSUULL, we are steadfast in ensuring that all staff members have a secure, reliable, and confidential means to report suspicious activities, including bribery and corruption. If you suspect any wrongdoing, whether related to corruption or any other suspicious activity, it is your duty to report it promptly. You may report such matters to your line manager in the first instance. If, for any reason, you are unable to speak to your line manager, you should use the reporting channel available at [https://t.me/toshdutau_no_korrupsiya_bot].

This policy encourages all staff members, students, and members of University bodies to raise concerns or provide evidence of malpractice or impropriety in good faith. Disclosures made in good faith that are not substantiated by subsequent investigation will not result in any adverse action. However, individuals making malicious or vexatious disclosures may be subject to disciplinary measures.

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