

# **ANTI-BRIBERY AND CORRUPTION POLICY**

## **TERMEZ UNIVERSITY OF ECONOMICS AND SERVICE (TUES)**

### **1. Definitions**

**1.1** For the purposes of this Policy, corruption shall be understood as dishonest, unethical, or improper conduct through which a person abuses a position of trust, authority, or institutional responsibility for personal, financial, professional, or other undue advantage. Within the context of a university, corruption may arise not only in financial transactions, but also in decision-making related to admissions, examinations, procurement, recruitment, academic progression, scholarships, partnerships, certification, and other institutional processes where fairness, transparency, and merit are expected.

**1.2** Bribery shall be understood as the offering, giving, requesting, receiving, or agreeing to receive any item of value, benefit, favour, service, hospitality, influence, or other advantage with the intention of affecting the conduct, judgment, independence, or decision of a person performing a public, academic, administrative, fiduciary, or legal duty. For TUES, this includes both direct and indirect acts intended to secure unfair advantage in relation to university business, academic outcomes, contracts, approvals, or institutional relationships.

### **2. Introduction and scope**

#### **A. Introduction**

**2.1** Termez University of Economics and Service is committed to the highest standards of integrity, transparency, probity, and ethical conduct in all areas of its activity. This commitment applies to teaching and learning, admissions, examinations, academic administration, research, financial management, procurement, human resources, partnerships, construction, student services, public engagement, and all other functions carried out in the name or interests of the University. Bribery and corruption are incompatible with the values of a modern higher education institution and undermine academic quality, institutional credibility, public trust, and the long-term sustainability of the University.

**2.2** This Policy is adopted in recognition of the fact that Uzbekistan's anti-corruption framework has become more structured and institutionally coordinated in recent years. The Anti-Corruption Agency of the Republic of Uzbekistan is the specially authorized state body responsible for the formulation and implementation of state anti-corruption policy, the analysis of corruption risks, and coordination of preventive efforts across sectors. The Agency also states that its work includes ensuring compliance with the United Nations Convention against Corruption. In the higher education field, the Ministry of Higher Education, Science and Innovation has publicly reiterated a zero-tolerance approach to corruption and emphasized transparent, digitalized procedures in licensing and related processes.

**2.3** TUES therefore adopts this Policy not merely as a formal compliance document, but as an operational expression of institutional values. The University recognizes that anti-bribery controls must be visible, enforceable, and integrated into everyday practice. Because universities are complex institutions involving interactions with students, families, staff, contractors, public authorities, international partners, and external intermediaries, anti-bribery obligations cannot be confined to one office or one procedure. They must apply across the University's full governance and operational environment.

#### **B. Approach**

**2.4** TUES adopts a zero-tolerance approach to bribery and corruption. Any proven involvement in bribery, facilitation payments, kickbacks, improper inducements, concealed conflicts of interest, or corrupt influence over institutional decisions will be treated as a serious breach of University rules and, where relevant, referred under disciplinary, contractual, civil, or criminal procedures. The University also recognizes that prevention is more effective than reaction; therefore, it will seek to build a culture in which improper offers are refused, suspicious conduct is reported, controls are respected, and staff and students understand both the ethical and legal implications of corruption.

### **C. Scope**

**2.5** This Policy applies to all persons acting for, studying at, working for, representing, or otherwise carrying out functions connected with TUES. This includes academic staff, administrative staff, senior managers, consultants, contractors, volunteers, temporary workers, interns, students, members of committees, recruitment or admissions personnel, external agents, partner institutions, and any other third parties acting in the name of or for the benefit of the University.

**2.6** The Policy applies to conduct occurring on campus, off campus, online, during travel, in international cooperation, in field activities, in meetings with suppliers or public officials, and in all other situations where a person may reasonably be understood to be acting in relation to University business or University interests.

**2.7** In cases where a student offers or attempts to offer any form of bribe or improper inducement for academic gain, including higher grades, altered attendance records, favorable examination treatment, preferential admissions treatment, or any similar advantage, the matter shall normally be dealt with under the University's student disciplinary processes in addition to any other action the University considers appropriate.

### **D. Bribery risks**

**2.8** TUES recognizes that bribery risk is not hypothetical. In higher education systems, corruption risks may arise in areas where there is discretion, pressure, competition, or access to valued outcomes. Public anti-corruption monitoring in Uzbekistan has specifically addressed openness and corruption risks in higher education admissions and exams, as well as the development of compliance-control approaches in universities.

**2.9** For TUES, potential bribery risks may arise in relation to admissions, entrance procedures, academic assessment, procurement, contracting, scholarship decisions, staff recruitment, promotion, travel approvals, external representation, construction and facilities management, partnership agreements, certification, and any process in which a private benefit might be improperly sought in exchange for institutional influence or discretion.

## **3. What is bribery? The law and other applicable standards**

### **A. Legal and ethical meaning**

**3.1** Bribery is not limited to the exchange of cash. It includes any financial or non-financial advantage offered, given, requested, or accepted in order to influence the improper performance of a function or decision. Within a university, this may include money, expensive gifts, paid travel, hospitality beyond reasonable limits, hidden commissions, "thank-you" payments, preferential treatment for relatives or connected persons, covert service arrangements, or the manipulation of academic or administrative outcomes.

**3.2** Improper performance in a university context includes conduct that departs from impartiality, fairness, transparency, merit, lawful procedure, or institutional duty. A decision may be improper not only when it is clearly unlawful, but also when it is influenced by personal benefit, concealed pressure, or biased treatment inconsistent with the responsibilities of the role.

## **B. National and international framework**

**3.3** This Policy is aligned with the Republic of Uzbekistan's anti-corruption policy environment and with international anti-corruption norms. The Anti-Corruption Agency states that, under Article 8<sup>1</sup> of the Law of the Republic of Uzbekistan "On Combating Corruption," it is entrusted with formulating and implementing state anti-corruption policy and coordinating anti-corruption work across ministries and departments, while also ensuring compliance with the requirements of the UN Convention against Corruption.

**3.4** In practical terms, this means that TUES must organize its internal systems in a way that supports prevention, early detection, proper reporting, and transparent response to corruption risks. The University therefore treats anti-bribery not only as a matter of sanctions, but as a matter of internal control, ethics, governance quality, and responsible institutional management.

## **C. Mitigation**

**3.5** TUES recognizes that an institution reduces corruption risk most effectively when it strengthens the overall environment in which decisions are made. The underlying drivers of bribery often include opportunity, weak controls, poor transparency, concentrated discretion, low reporting confidence, and normalization of improper exchanges. The University's response is therefore designed to reduce risk by improving institutional culture, restricting the opportunity to exchange improper benefits, and reducing the demand for corrupt advantage through fair and visible systems.

**3.6** For this reason, anti-bribery controls at TUES are linked to documentation, approval pathways, separation of duties, transparency in decision-making, review of conflicts of interest, scrutiny of high-risk transactions, staff awareness, and secure reporting mechanisms. The University's aim is not only to punish misconduct after the fact, but to make improper conduct more difficult, more visible, and less likely to occur.

## **4. Identifying the risk of bribery**

### **A. Risk management**

**4.1** Effective risk management lies at the centre of this Policy. At TUES, bribery and corruption risks are treated as part of the University's broader governance, internal control, and institutional risk management system. This means that anti-bribery considerations should not be isolated from strategic planning, financial controls, procurement oversight, academic quality assurance, project management, or operational review. Instead, the University shall identify areas where bribery could arise, assess the nature and seriousness of the exposure, and put in place proportionate mitigation measures.

**4.2** The University also recognizes that bribery risks may vary according to context. What appears to be ordinary relationship-building in one setting may carry heightened risk in another, especially where public authority, licensing, inspection, academic evaluation, or supplier selection are involved. The same is true for international partnerships, foreign travel, recruitment intermediaries, and local customs around gifting or hospitality. For this reason, TUES expects staff

and decision-makers to exercise judgment, caution, and documentary discipline rather than relying only on informal practice.

## **B. Areas of risk**

**4.3** Although the risk profile of the University may change over time, the areas requiring particularly careful attention are likely to include admissions and enrollment decisions, examinations and grading, awarding of diplomas or certificates, procurement of goods and services, construction and renovation contracts, outsourcing, cash or in-kind donations linked to expected influence, recruitment and promotion decisions, student housing and scholarship allocation, international representation, and the use of external agents or intermediaries.

**4.4** Procurement deserves special attention because it often combines financial value, vendor competition, deadlines, and discretionary judgment. Similarly, academic processes such as grading, thesis supervision, and admissions are especially sensitive because they directly affect the rights and futures of students. TUES therefore recognizes that anti-bribery protection must cover both financial administration and academic administration.

**4.5** The University shall periodically review these areas and ensure that risk identification is not static. New risks may arise through digital systems, cross-border partnerships, consultancy arrangements, private sponsorship, event management, outsourced services, or rapid institutional expansion. Emerging risks shall therefore be added to the relevant risk registers and reviewed through the University's management processes.

## **5. Gifts, hospitality and entertainment**

### **A. Outline**

**5.1** Gifts, hospitality, and entertainment are understood in this Policy as covering the offering or receiving of gifts, meals, travel support, accommodation, event invitations, tokens of appreciation, honoraria outside approved rules, social entertainment, or other benefits connected with University business. TUES recognizes that not all hospitality is improper. Universities engage with alumni, employers, officials, partners, donors, suppliers, and academic guests, and some forms of modest and transparent hospitality may be legitimate in this context. However, such benefits become problematic where they could influence, or appear to influence, professional judgment or institutional decisions.

### **B. Scope**

**5.2** TUES permits only reasonable, proportionate, transparent, and professionally justifiable hospitality that serves a legitimate academic, administrative, or partnership purpose and does not create dependency, obligation, or appearance of favouritism. Hospitality must never be used to obtain an improper academic, commercial, procurement, regulatory, or reputational advantage.

**5.3** Hospitality must not be accepted where timing, value, context, or frequency could reasonably give rise to a perception of undue influence. For example, if a supplier offers valuable hospitality shortly before or during a tender decision, if an applicant or family offers gifts during an admissions process, or if a partner offers benefits linked to an institutional decision, such hospitality is not compatible with this Policy.

**5.4** TUES expects all staff and relevant representatives to apply a simple principle of judgment: if a benefit is not modest, transparent, defensible, and clearly unrelated to influencing a decision, it should not be accepted or offered. Where there is doubt, the safer course is refusal, declaration, or prior advice.

## **C. Register and declarations**

**5.5** The University shall maintain an appropriate internal system for recording gifts and hospitality where declaration is required. This may take the form of a central register or another approved recording mechanism determined by the University's governance arrangements. The purpose of this requirement is not administrative burden for its own sake, but traceability, transparency, and institutional protection.

**5.6** TUES prohibits the giving or receiving of money, cash-equivalents, personal commissions, or unofficial payments in all circumstances. No employee, official, student representative, or other person acting for the University may offer, solicit, or accept such benefits.

**5.7** If a gift or hospitality offer cannot be politely refused immediately due to protocol, context, or risk of causing serious offense, it must be declared as soon as possible through the designated internal procedure. The fact that a benefit has been declared does not automatically make it acceptable; rather, declaration enables the University to assess the circumstances and determine whether further action is required.

**5.8** The University also recognizes that staff and representatives may sometimes feel pressure to accept benefits, particularly in settings involving hierarchy, external influence, or local expectations. In such circumstances, TUES expects the individual concerned to seek guidance at the earliest reasonable opportunity so that institutional support can be provided and the matter can be handled consistently with this Policy.

## **6. Policy statement**

**6.1** TUES places high value on its reputation for ethical behavior, academic fairness, lawful conduct, and responsible institutional governance. The University recognizes that even a small number of bribery incidents can cause serious damage not only to finances or compliance status, but also to public trust, student confidence, partnership credibility, and the standing of its degrees and academic processes.

**6.2** The University therefore prohibits the offering, giving, promising, requesting, agreeing to receive, or accepting of any bribe or corrupt advantage in any form, whether direct or indirect, whether monetary or non-monetary, whether involving internal actors or external parties.

**6.3** TUES expects every individual and organization associated with the University to act honestly, transparently, and in a manner consistent with the law, professional ethics, and the principles set out in this Policy. This expectation applies equally to staff, students, contractors, agents, consultants, suppliers, and institutional partners.

**6.4** Any suspected breach of this Policy, any attempted bribe, any suspicious inducement, or any concern that an institutional decision may be improperly influenced must be reported through the University's reporting processes. Silence, concealment, or informal handling of serious concerns is contrary to the principles of this Policy.

**6.5** The prevention, detection, and reporting of bribery are shared responsibilities across the University. Anti-bribery compliance is not the task of one office alone; it depends on the conduct, awareness, and integrity of the whole University community.

## **7. Communication**

**7.1** TUES recognizes that a policy is only effective if it is known, understood, and applied. It is therefore the responsibility of University leadership, deans, heads of departments, heads of

administrative units, and managers of relevant processes to ensure that this Policy is communicated regularly and meaningfully to those engaged in University business.

**7.2** Communication shall extend not only to staff but also, where appropriate, to students, contractors, service providers, consultants, intermediaries, and other external parties whose conduct may affect or reflect on the University. Where the University engages in higher-risk activity, including procurement, external contracting, admissions operations, international representation, or third-party cooperation, the communication of anti-bribery expectations should be especially clear.

**7.3** TUES shall also seek to provide appropriate guidance, orientation, and training in areas where bribery risk may be elevated. This includes persons involved in procurement and contracting, admissions and examinations, finance and payments, project management, partnership development, travel-related approvals, and positions involving significant external contact or decision-making discretion.

**7.4** The University's public communications environment should support this Policy. TUES's official website already presents institutional contact information and governance-related information, including links to items such as mission, structure, councils, requisites, and financial reports. This transparency baseline should be strengthened through publication of relevant institutional policies and reporting pathways.

## **8. Monitoring and review**

**8.1** This Policy and the procedures linked to it shall be reviewed regularly in order to ensure that they remain effective, current, and proportionate to the University's actual risk exposure. Monitoring should include consideration of identified risks, reported incidents, control weaknesses, training needs, procurement patterns, admissions integrity, disciplinary outcomes where relevant, and lessons arising from audits or investigations.

**8.2** Risk identification shall form a central part of the monitoring process. The University should not assume that the most important bribery risks are fixed or already fully known. Changes in scale, structure, partnerships, staffing, digitalization, external regulation, or sector practice may require the University to update both its controls and its understanding of where risk is most likely to arise.

**8.3** The results of monitoring and review should be reported through the University's governance and management arrangements. Where incidents or control weaknesses are identified, corrective action should be documented, assigned, and followed through. Where no incidents are reported, the University should still assess whether this reflects healthy institutional culture or under-reporting.

## **9. Reporting concerns (including whistleblowing)**

**9.1** TUES encourages all staff, students, contractors, and other persons associated with the University to report concerns relating to suspected bribery, attempted bribery, improper inducements, hidden conflicts of interest, suspicious procurement conduct, admissions irregularities, examination manipulation, or any other conduct that may breach this Policy.

**9.2** Reporting should be possible through safe and confidential channels approved by the University. These may include direct reporting to line management, the Rectorate, internal audit, legal/compliance functions, HR where relevant, or other formally designated officers or

committees. The University should ensure that reporting mechanisms are accessible, understandable, and not unnecessarily intimidating.

**9.3** TUES is committed to ensuring that persons who report concerns in good faith are protected from retaliation, intimidation, adverse treatment, or procedural disadvantage because they have spoken up. The University considers this protection essential to the credibility of its anti-bribery framework. A reporting culture cannot exist where individuals fear damage for acting honestly.

**9.4** Allegations raised under this Policy shall be treated seriously, assessed fairly, and addressed in accordance with applicable University procedures and relevant law. Where evidence supports a finding of misconduct, disciplinary, contractual, administrative, or legal action may follow. Attempted bribery, just like completed bribery, may constitute serious misconduct because it undermines institutional trust and the integrity of University processes.

## **10. Acknowledgements**

**10.1** This Policy has been developed in light of contemporary anti-bribery and anti-corruption practice in higher education and public-sector governance, while being adapted to the institutional context of Termez University of Economics and Service and the anti-corruption policy environment of the Republic of Uzbekistan.

**10.2** The University also acknowledges the importance of international anti-corruption norms and the relevance of state policy developments in Uzbekistan, including the role of the Anti-Corruption Agency, the implementation of state anti-corruption measures, and the emphasis on transparency, compliance control, and openness in the higher education system

## **11. Version control**

**11.1** This Policy shall be maintained as an official University-wide governance document and shall be subject to version control, formal approval, and periodic review in accordance with the University's internal policy framework.

**11.2** The approved version should record, at minimum, the document title, version number, approval status, approving authority, approval date, effective date, review date, document owner, and any significant amendments introduced at the time of revision.

**Rector**



**A. Absamatov**