University: Navoi State University of Mining and Technologies
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[7] Governance and Digitalization (GD)
[7.18] Anti-Corruption and Integrity System of the University









REPORT ON
THE IMPLEMENTATION OF ANTI-CORRUPTION MEASURES AT NAVOI STATE UNIVERSITY OF MINING AND TECHNOLOGIES

General Information on the Implementation of the University's Anti-Corruption Program

The University has established a systematic process for familiarizing all personnel with the «Anti-Corruption Policy (Strategy)» approved by University Council Resolution No. 5 dated December 27, 2021, the «Internal Regulations of Navoi State University of Mining and Technologies» approved by Meeting Resolution No. 1 dated August 29, 2022, the «Code of Ethics of Navoi State University of Mining and Technologies» and other internal normative documents. Each employee receives comprehensive explanation of the substance and implications of these instruments.

To support the operational activities of the Compliance Control Management Department, 19 internal institutional legal documents were reviewed and revised with appropriate amendments, drawing upon model normative-legal instruments issued by the Anti-Corruption Agency of the Republic of Uzbekistan, the Ministry of Mining Industry

and Geology, and the Ministry of Higher Education, Science and Innovations, adapted to the specific institutional context of the University.

During 2025, in cooperation with the Departments of Social, Humanitarian Sciences and Physical Education and Economics and Management, the Compliance Control Management Department organized training seminars in which 148 faculty members, staff, and tutors received instruction on internal regulations, the Code of Ethics, and internal anti-corruption normative documents.

With the involvement of faculty members, students, and departmental staff across all faculties of Navoi State University of Mining and Technologies, the following preventive activities were conducted during the reporting period: 67 prophylactic events, 17 roundtable discussions, 8 training seminars, spiritual-educational events, and 5 competitions. These activities engaged 180 faculty members, over 6,000 students, and approximately 50 lecturers.

The Head of the Compliance Control Management Department B.Umarov, contributed an analytical and methodological article entitled «Compliance Monitoring at the University» to the national newspaper *Inson va Qonun* (Issue No. 9, March 5, 2025), addressing issues of anti-corruption efforts and prevention. He also participated in a roundtable discussion published in the newspaper *Konchilar Hayoti* of Navoi Mining and Metallurgical Combine JSC (Issue No. 10, May 30, 2025) under the title «Education Will Be Free of Corruption» and contributed to a roundtable discussion on higher education reforms published in the regional newspaper *Do'stlik Bayrog'i* (Issue No. 25, June 20, 2025), under the title «Changes in Higher Education Strengthen the Motivation to Learn».

Four television broadcasts were aired via the Navoi Regional Television and Radio Broadcasting Company's channel *Diyor-24*. On May 15, 2025, the Head of the Compliance Control Management Department B.Umarov appeared on the programme *Assalom Yangi Kun* on Navoi RTRBC, sharing views on the principle of integrity as a foundational element of societal progress, as well as information on legal awareness activities aimed at fostering anti-corruption intolerance among students. Additionally, a radio broadcast was aired on June 8, 2025, covering an anti-corruption event held at a military unit in Navoi city. An «Open Doors Day» event held on December 16 of the same year was also broadcast on radio.

The University admitted students from technical colleges - those who had achieved good or excellent grades in more than 50% of their assessments - directly into the second year of relevant degree programmes through an interview-based process. These interviews were conducted transparently and openly, with live broadcasting on the YouTube platform. Furthermore, individuals with more than five years of professional

experience in economic sectors were admitted to relevant programmes through examinations under a differentiated contract-based system, with the proceedings recorded and published on YouTube. All admission procedures at the University were conducted in an open and transparent manner.

Throughout all faculties, the Department systematically conducts preventive discussions, roundtable dialogues, and training seminars to explain the substance and practical application of the «Anti-Corruption Policy (Strategy)» the «Code of Ethics» and other normative instruments to faculty members, staff, and students, including responses to questions and practical recommendations.

Internal Normative Documents Adopted in the Field of Anti-Corruption and the Status of Personnel Familiarization

The Compliance Control Management Department developed and introduced into practice 19 internal normative legal documents aimed at enhancing anti-corruption intolerance among faculty, staff, and students. These documents were formulated on the basis of model normative-legal instruments issued by the Anti-Corruption Agency of the Republic of Uzbekistan, the Ministry of Mining Industry and Geology, and the Ministry of Higher Education and Innovations, adapted to the University's institutional specifics.

During the reporting period, 111 newly appointed faculty members and staff across the faculties were familiarized with the internal normative documents and the University's Anti-Corruption Policy.

To ensure comprehensive dissemination of these documents, training seminars were organized for the personnel of each department, chair, and center, during which the substance of the documents was communicated to all staff members and formally recorded in the designated registration log. Electronic versions of the documents were distributed to department heads, chair directors, and center managers.

During this period, 200 copies of visual advocacy materials were produced and distributed to students and staff during training seminars and roundtable discussions. These materials carried the following thematic messages: «We Are Against Corruption» «Education Free of Corruption Is Quality Education» «Together We Overcome Corruption» «Say No to Corruption» «Together We Stop Corruption» and «No Room for Corruption (Neither Offer Nor Accept)».

Development of a Corruption Risk Map and the Action Plan for Mitigating High-Level Risks

A corruption risk map has been compiled for Navoi State University of Mining and Technologies, based on a comprehensive analysis of all positions within the

institution and the corruption-generating factors associated with them. In the risk map approved by the University Rector, the corruption risks of structural units have been classified for 2025 into three levels - «High» «Medium» and «Low» - in accordance with the requirements of the «Methodology for Assessing Corruption Risks».

According to this classification, four positions were identified as carrying «High»-level corruption risks. In addition, a list of 11 positions most susceptible to corruption risk within the University was compiled and approved.

Pursuant to the action plan for minimizing and eliminating risks, approved by the University Rector, the Compliance Control Management Department is implementing the following measures to reduce corruption risks from higher to lower levels: full automation of relevant functional tasks and operations within the University; comprehensive regulatory oversight of specific functions and duties; mandatory collegial decision-making - requiring the involvement of three or more individuals - in the preparation, review, and adoption of decisions affecting citizens' interests; and other preventive measures aimed at reducing corruption-generating risks and preventing the commission of corrupt acts.

For the purpose of detecting, preventing, and suppressing corruption-related violations, as well as eliminating their consequences and the underlying conditions that enable them, the internal normative documents of two structural units and four affiliated institutions - the Academic Lyceum, Gazgan and Karmana Polytechnic Colleges, and Uchkuduk and Zarafshan Industrial Colleges - were reviewed with regard to the presence of anti-corruption principles and provisions.

Based on the findings of this review, each of the four institutions received recommendations to revise and update their regulatory documents, incorporate anti-corruption clauses, and introduce competitive and interview-based recruitment requirements into job descriptions. During the reporting period, a list of positions and functions with elevated corruption risk was compiled, and a corruption risk map was developed and approved. Work in this area is ongoing.

Measures Implemented for the Regulation of Conflicts of Interest

In order to ensure compliance with the tasks stipulated in Presidential Decree No. PQ-210 of June 5, 2024, «On Measures for the Effective Implementation of the Law of the Republic of Uzbekistan 'On Conflicts of Interest,'» the University has adopted a supervisory action plan and an implementation schedule approved by the Prime Minister of the Republic of Uzbekistan. All activities related to conflict of interest management are conducted in accordance with these instruments.

For the purpose of identifying conflicts of interest, detecting corruption-generating factors in a timely manner, and eliminating them, all faculty members and staff of the University complete a conflict of interest disclosure declaration on an annual basis.

During the reporting period, annual declarations and written commitments (guarantee letters) were obtained from 111 newly appointed faculty members and staff.

Declarations completed by faculty members of university chairs and staff of structural units are jointly analyzed by the Human Resources Department and the Compliance Management Department. Identified potential or actual conflicts of interest are reviewed by the Ethics and Anti-Corruption Commission, which subsequently submits a report to the University Rector.

By resolution of the Ethics and Anti-Corruption Commission, conflicts of interest are prohibited between the University's administrative leadership - the Rector, Vice-Rectors, Deans, and heads of structural units (including department heads and chief accountants) - and their close relatives or affiliated persons, particularly in matters of financial and material responsibility.

Furthermore, the Ethics and Anti-Corruption Commission regularly issues relevant recommendations and explanatory guidance to Faculty Deans, Chair Directors, and Department Heads on preventing the emergence of conflicts of interest and ensuring their non-occurrence.

Incorporation of Anti-Corruption Clauses into All Contracts, Including Employment Contracts

During 2025, a total of 632 contracts were formalized at Navoi State University of Mining and Technologies.

- **Total contracts:** 632 (total value: 20,922,651,592 UZS)
- **Directly concluded contracts:** 39 (total value: 2,690,407,297 UZS)

All contracts concluded directly with suppliers incorporate supplementary anti-corruption clauses comprising seven provisions. Under these clauses, the parties agree to refrain from engaging in any corruption-related conduct in connection with the contract - during its conclusion, throughout its term, and after its expiration - and commit to mutual cooperation in recognizing and adhering to the anti-corruption preventive measures stipulated in the contract.

Each contracting party guarantees that, at the time of conclusion of the contract, neither it nor its executive bodies, officials, or employees have unlawfully transferred funds or material valuables in connection with the contractual relationship; that no informal monetary payments or material benefits have been solicited, offered, or

promised in exchange for concluding the contract; and that no material or other privileges or advantages have been received or will be received in the future.

Similarly, all employment contracts concluded with newly appointed personnel by the Human Resources Department contain dedicated anti-corruption clauses, including a commitment to active participation in the University's «Corruption-Free Sector» initiative. These provisions were incorporated into the employment contracts of all 111 faculty members and staff hired during the current year.

Results of Monitoring Conducted on the Lawfulness of Procurement Processes, Employee Gifts and Bonuses, and Personnel Recruitment Procedures

During 2025, a total of 632 contracts were formalized at the University, with a combined value of 20,922,651,592 UZS. Of these, 39 were directly concluded contracts with a combined value of 2,690,407,297 UZS.

These contracts were concluded in accordance with Presidential Resolution No. PQ-3953 of September 27, 2018, «On Measures for the Implementation of the Law of the Republic of Uzbekistan 'On Public Procurement,'» and the Law of the Republic of Uzbekistan No. ORQ-684 of April 22, 2021, «On Public Procurement». The contracts covered the procurement of foreign academic and scientific literature, textbooks, and study guides (from copyright-holding publishers), consumable laboratory materials (including reagents, chemical vessels, components, biological materials, and related items), and goods, works, and services required for the implementation of research projects approved by the Ministry of Higher Education, Science and Innovations of the Republic of Uzbekistan.

All directly concluded contracts contain seven supplementary anti-corruption provisions obligating both parties to refrain from corrupt conduct throughout the contractual relationship and to cooperate in upholding the preventive measures stipulated therein. Each party provides assurances that no unlawful transfer of funds or material benefits has occurred in connection with the contract, and that no informal payments, offers, or promises of benefit have been made or received.

During 2025, a total of 442 counterparties underwent verification procedures; no instances of corrupt conduct were identified.

No gifts were presented to staff members, and no related expenditures were incurred during 2025. Continuous monitoring of the targeted expenditure of state budget allocations and extra-budgetary funds, as well as the prevention of unlawful expenditures and financial violations, is conducted in cooperation with the University's internal auditor.

Results of the Review of Appeals Received Through Communication Channels, and the Status of Compliance with Oversight Measures and Established Principles

No appeals concerning instances of corruption were received at Navoi State University of Mining and Technologies during 2025.

In order to identify and eliminate factors that may give rise to complaints from students, their parents, faculty members, and other staff; to prevent the commission of corrupt acts in the University's operations; and to ensure transparency and openness across all institutional systems and sectors, the following hotlines operate continuously:

- +998-79-223-53-82
- +998-79-223-53-62

In addition, the following official channels are available on social media platforms for appeals from students, faculty, and other University staff:

1. Official Website: https://nsumt.uz/
2. Telegram Channel: https://t.me/ndktu_rasmiy
3. Facebook Page: https://www.facebook.com/navoiydavlat.konchilikinstituti.1
4. Instagram Page: https://www.instagram.com/navoiydavlatkonchilikinstituti/
5. Anti-Corruption Telegram Bot: https://t.me/NDKTU_antikorrupsiyabot

In addition, «Justice Boxes» have been installed in areas of the University building not covered by surveillance cameras. During the reporting period, students, their parents, faculty members, or other University staff through any of the aforementioned communication channels - including hotlines, official social media channels, or Justice Boxes, submitted no appeals or complaints regarding corruption.

Identified Violations and Disciplinary Measures Applied to Personnel

The University maintains continuous oversight in detecting instances of corruption and identifying individuals involved in such conduct, with a view to applying strict disciplinary sanctions. During 2025, disciplinary measures were imposed as follows:

- The Student Affairs Accountant and the Chief Auditor received disciplinary sanctions for a series of procedural errors and deficiencies.
- The Chief Procurement Specialist received disciplinary sanctions for deficiencies in the execution of state procurement procedures.
- The Accounting Department Accountant, the Chief Accountant, the Director of the Digital Educational Technologies Center, and the Chief Procurement

Specialist each received two reprimands and financial penalties amounting to up to 50% of their monthly salary for deficiencies identified in the inventory of material assets.

- Three faculty members, four tutors, and nine students received reprimands for gross violations of the University's Internal Regulations and the Code of Ethics, including incidents of interpersonal conflict among students.

Disciplinary sanctions were also applied to J.R. Ravshanov, Sh.N. Yakhshiev, and O. Sayfidinovfor deficiencies in the supervision and organization of student practical placements. I.I. Qalandarov received a disciplinary sanction for errors in entering interim assessment results into the HEMIS information system.

Prophylactic Measures Aimed at Enhancing the Legal Awareness and Culture of Personnel and Preventing Corruption

The following activities were undertaken to develop the legal awareness and culture of University personnel and to foster and reinforce intolerance toward corruption:

During 2025, in collaboration with the Departments of Social, Humanitarian Sciences and Physical Education and Economics and Management, the Compliance Control Management Department trained 148 faculty members, staff, and tutors on internal regulations, the Code of Ethics, and internal anti-corruption normative documents.

A total of 19 internal normative legal documents were revised and supplemented, drawing upon model instruments issued by the Anti-Corruption Agency of the Republic of Uzbekistan, the Ministry of Mining Industry and Geology, and other relevant authorities.

With the involvement of faculty, students, and departmental staff across all faculties, the following activities were organized: 67 prophylactic events, 17 roundtable discussions, 8 training seminars, 5 competitions, and a series of legal awareness and spiritual-educational activities aimed at enhancing students' legal literacy and fostering intolerance toward all manifestations of corruption. These activities collectively engaged 180 faculty members, over 6,000 students, and approximately 50 guest lecturers.

Analytical and methodological articles by the Head of the Compliance Control Management Department B.Umarov were published in the newspaper *Inson va Qonun* (Issue No. 9, March 5, 2025) under the title «Compliance Monitoring at the University» and in *Konchilar Hayoti* (Issue No. 10, May 30, 2025) under the title «Education Will Be Free of Corruption». Four television broadcasts were aired on the *Diyor-24* channel of Navoi Regional Television and Radio. On May 15, 2025, B.Umarov appeared on the programme *Assalom Yangi Kun*, and on June 20, 2025, he participated in an *Open Dialogue* discussion on the theme «Corruption and National Development: Problems and

Solutions» sharing views on integrity as a driver of social progress, the principles of transparency in admission processes, and ongoing anti-corruption advocacy activities at the University. A radio broadcast covering an anti-corruption event at a military unit in Navoi city was aired on June 8, 2025.

Admission procedures at the University - including the interview-based enrollment of technical college graduates with strong academic records into the second year of relevant programmes, and the examination-based admission of experienced professionals - were conducted openly and transparently, with proceedings broadcast and recorded on digital platforms.

Across all faculties, the Department systematically conducts preventive discussions, roundtable sessions, and training seminars to explain and promote the practical application of the Anti-Corruption Policy (Strategy), the Code of Ethics, and other normative instruments among faculty, staff, and students.

Assessment of Compliance with the University's Anti-Corruption Policy Requirements, Corruption-Generating Risks, and Proposals for Their Elimination

The Anti-Corruption Policy (Strategy) of Navoi State University of Mining and Technologies comprises seven chapters and 29 articles. As an internal normative instrument, the Policy establishes the foundational requirements and principles for preventing and combating corruption-related violations within the University and its affiliated institutions, with the aim of achieving the core educational and developmental mission of the University. The Policy applies to all faculty members, staff, students, doctoral candidates, and researchers engaged in employment or academic relations with the University and its affiliated institutions, regardless of their position or functional responsibilities. Any individual admitted to employment or study at the University or its affiliated institutions is required to read and acknowledge the Policy in writing and to comply with its provisions.

In pursuance of the objectives set forth in the Policy, the Compliance Control Management Department implements the following activities and measures:

To cultivate a culture of strict intolerance toward corruption among students and staff of the University and its affiliated institutions, 67 prophylactic events, 17 roundtable discussions, 8 training seminars, 5 competitions, and a series of legal awareness and spiritual-educational activities were organized, collectively engaging 180 faculty members, over 6,000 students, and approximately 50 guest lecturers.

With regard to the timely detection and suppression of corruption-related violations, and the elimination of their consequences and underlying causes, one case concerning assessment irregularities at University-affiliated technical colleges was

submitted to the Navoi Specialized Prosecutor's Office for legal evaluation by letter No. 1-01/32 dated January 8, 2024.

Continuous oversight is maintained to identify emerging instances of corruption, determine the individuals involved, and apply appropriate disciplinary sanctions. During 2025, disciplinary penalties - including reprimands and salary reductions of up to 50% - were imposed on a number of employees for procedural deficiencies in student affairs accounting, procurement, asset inventory management, and digital educational technology administration. Disciplinary sanctions were also applied to faculty members, tutors, and students for gross violations of internal regulations and the Code of Ethics, as well as to specific staff members for deficiencies in the organization of student practical placements and in the entry of interim assessments into the HEMIS information system.

In the area of early conflict of interest prevention, four roundtable discussions were organized with the participation of law enforcement representatives, covering topics such as anti-corruption legislative compliance, prohibitions on corrupt conduct, staff conduct obligations, and mechanisms for reporting suspected violations.

Transparency and public accountability are ensured through continuous disclosure to staff, students, doctoral candidates, and the broader public of the measures adopted and implemented in the field of anti-corruption. Faculty, staff, students, and doctoral candidates are systematically advised against direct or indirect participation in activities that may give rise to corruption risks.

All University and affiliated institution staff are prohibited from accepting - in connection with the performance of their official duties - any gifts (including birthday gifts, flowers, or similar items), hospitality (such as meals organized during examination periods or other occasions), loans, guarantees, sureties, or incentive payments from students, doctoral candidates, or natural or legal persons, whether in cash, non-cash, or equivalent form, or as securities. Following prophylactic interviews on this matter, staff members sign formal acknowledgment statements confirming that they have been duly informed of these restrictions.

To ensure that the processes of personnel selection, attestation, performance evaluation, remuneration, and the assignment of bonuses and supplementary payments are conducted in a transparent, equitable, and impartial manner for all staff, the University Rector has established dedicated commissions and working groups by order. All such matters are resolved on a collegial basis by majority vote.

The procedure for reporting attempted inducements to engage in corrupt conduct, or information regarding known instances of corruption, is governed by the Regulations on the Acceptance and Processing of Reports Submitted through the University's Communication Channels for Anti-Corruption Notifications.

Additional evidence link (i.e., for videos, more images, or other files that are not included in this file):