# ANTI-BRIBERY AND CORRUPTION POLICY OF URGENCH STATE UNIVERSITY

#### Introduction

Urgench State University (the "University") is a highly respectable and recognizable organization. It has gained its name and reputation among its competitors and consumers through its commitment to conducting business according to moral, ethical, and legal standards. The University does not allow and tolerate any kind of bribery and corruption.

This Anti-Bribery and Corruption Policy (the "Policy") discourages and prohibits any kind of bribe or corrupt practice with any kind of stakeholder, including offering, promising, or providing any kind of means or value to any stakeholder, including customer, government official, business partner, or a third party to induce any improper action in relation to our business.

#### **Objective**

This Policy outlines the University's moral and legal responsibility to counter bribery and corruption and provide tools and methods to keep check and balance on such practices.

#### Corruption

For the purpose of this Policy, bribery offense includes bribes, kickbacks, extortions, either active or inducement of any kind.

## **Penalty**

Violation of this Policy is highly discouraged. If any employee of the University is found in violation of this Policy can face severe civil and criminal penalties in addition to disciplinary proceedings.

## Scope

This Policy applies to all the employees, directors, officers, and any third party which is directly engaged with our business. Further, the Policy applies to any subsidiary, branch office, or liaison office of the University, regardless of its location.

## **Applicable Laws**

This Policy is governed by the anti-corruption and anti-bribery laws of Uzbekistan.

### **Prohibition of Bribery**

-The University employees are prohibited from offering, promising, or sanctioning any kind of payment to government officials to secure improper business advantage or influence bureaucratic work.

-The University prohibits employees from taking any ill gain or advantage through improper means from any private entities.

Employees are strictly advised to obtain approval from the University to advance any item of value to any government official or private entity.

Provision of any kind of travel, gifts, cash, or meals to any government official or any person in exchange for any ill gain is prohibited.

Use of donations for any unfavorable gain or to influence any person is strictly prohibited. The University will sanction any kind of charitable gesture or donation through the proper procedure.

Sometimes it must be necessary to appropriate funds to promote or demonstrate University products or services, but it must not be used to influence the normal functioning of such officer. Before appropriating such funds, approval from the concerned department is necessary.

It is strictly prohibited to employ any government official, employee of a private entity, or their relatives to influence or gain an undue benefit. If the employment of such a person is necessary, prior approval of the University's legal counsel is necessary.

Political contributions advanced to influence government officials are strictly prohibited. All political contributions will go through the proper channel outlined in a separate policy.

Third parties associated with the University, either directly, are strictly prohibited from making any corrupt practice on behalf of the University.

All payments to third parties in exchange for their services and contributions to the University must be recorded appropriately and evidenced. Additionally, third parties interacting with a government official on behalf of the University must be documented.

All third parties are obligated to do due diligence before engaging with government officials on behalf of the University.

To ensure compliance with this Policy, the University may conduct periodic audits of the University. All employees, directors, officers, and stakeholders are obligated to cooperate with the audit process.

All directors, officers, employees, and stakeholders are obligated to report any violation of this Policy to the University's legal team. Failure to report such an incident constitutes a violation of this Policy and leads to disciplinary action.

The Policy shall come into effect on 5th January 2024

Rector



**B.I.Abdullayev**