

Documented data of IT Park's anti-corruption management system		
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“APPROVED”
Executive Director of “Directorate of the
Technological Park of Software Products and
Information Technologies” LLC

_____ **A. Kuchkarov**

2024 “ ___ ” _____

METHODOLOGY
for Identification and Assessment of Corruption Risks

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2. Purpose of document development

This Methodology defines the procedure for identifying and assessing corruption risks in the activities of "Directorate of the Technological Park of Software Products and Information Technologies" LLC.

3. Abbreviations, terms, and definitions

Ministry	Ministry of Digital Technologies of the Republic of Uzbekistan.
Agency	Anti-Corruption Agency of the Republic of Uzbekistan.
IT Park	"Directorate of the Technological Park of Software Products and Information Technologies" LLC.
ACMS	Anti-Corruption Management System.
ND	Normative document.
Corruption Risk	The probability of a person committing corrupt actions to gain material or non-material benefits from their official or service position for personal interests or the interests of others, based on existing illegal causes and conditions.
Corruption Risk Map	A document containing the description and degree of possible corruption risks associated with tasks and functions (processes) implemented in IT Park activities, mechanisms regulating functions (processes), the position responsible for implementing functions (processes), measures to eliminate corruption risks, the level of residual corruption risk, and executors responsible for implementing measures to eliminate corruption risks.
Corruption Offense	An act with signs of corruption for which liability is provided by law.
Corruption Risk Assessment	Activities involving the analysis of IT Park's activities (tasks and functions), identification of existing corruption risks, and assessment of the level of these risks.
Residual Risk	The risk remaining after measures have been taken to eliminate the identified corruption risk.
Special Unit	The internal anti-corruption control structure within the IT Park system.
Working Group	A staff composition formed to assess corruption risks in the absence of internal anti-corruption control structures.

4. Ссылки на нормативные документы

- ISO 37001:2016 "Anti-Corruption Management System". Requirements.
- Methodology for identifying and assessing corruption risks in the activities of the Ministry and its system enterprises, organizations, and institutions, approved by Annex No. 4 to the Order of the Ministry of Digital Technologies of the Republic of Uzbekistan No. 513 dated October 28, 2022.

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5. ОТВЕТСТВЕННОСТЬ

- The responsibility for applying this methodology to operations rests with the heads of all units within IT Park.

6. PROCESS

6.1. General Provisions

6.1.1. The goals of identifying and assessing corruption risks in IT Park's activities are:

- Determining the tasks and functions most susceptible to corruption risks in IT Park's activities, and forming a list of positions with high corruption risk;
- Developing measures to eliminate corruption risks.

6.1.2. Identification and assessment of corruption risks include the development of:

Corruption risk map;

Anti-corruption programs;

List of positions with high corruption risk;

Electronic register of corruption-prone relations.

6.1.3. The assessment of corruption risks is conducted by IT Park up to once a year.

6.1.4. The Anti-Corruption Agency of the Republic of Uzbekistan (hereinafter referred to as the Agency) may provide instructions to improve the Ministry's system for assessing and eliminating corruption risks and preventing shortcomings in this area.

6.2. Organization of identifying and assessing corruption risks

6.2.1. Identification and assessment of corruption risks must be carried out by IT Park management and all structural and regional units, including the activities of commissions created and operating for various purposes.

Identification and assessment of corruption risks are conducted by a working group created under the anti-corruption management system in IT Park activities.

6.2.2. Members of the working group consist of heads of structural units and specialists of IT Park.

6.2.3. The composition of the working group is approved by the General Director of IT Park based on an order or directive and its activities are coordinated.

6.2.4 For identifying and assessing corruption risks, the working group under the supervision of the special unit or responsible person appointed for the anti-corruption management system in IT Park carries out the following tasks:

- Organizing and coordinating work on identifying and assessing corruption risks (determining tasks, responsibilities, and powers assigned to the positions of senior management and departments);
- Identifying processes where corruption cases may occur for each position and assessing risks;
- Developing a risk map for senior management and department positions;
- Developing and approving an anti-corruption program;

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- Presenting the approved program to the Anti-Corruption Department in IT Park;
- Transmitting the approved program to senior management and all departments and regional units for implementation.

6.3. Procedure for identifying and assessing corruption risks

6.3.1. Corruption risks, duties, responsibilities, and authorities regarding positions are determined based on all documents (job descriptions, employment contracts, orders, instructions on establishing duties, responsibilities, and authorities, and others), as well as internal and external sources of information.

6.3.2. Sources of internal information include:

- The legal basis of IT Park's activities (tasks and functions);
- Internal audit materials, including service checks;
- Minutes of ethics commission meetings;
- Results of monitoring anti-corruption efforts;
- Results of surveys conducted by the working group on the activities (tasks and functions) of IT Park, including sociological research, and others.

6.3.3. Sources of external information include:

- Appeals (reports) and statistical data on offenses in IT Park's activities;
- Results of surveys, including sociological studies, conducted by the Agency, the Ministry, or other (authorized) organizations on the activities (tasks and functions) of IT Park;
- Materials provided by law enforcement agencies, and others.

6.3.4. When identifying corruption risks in the activities (tasks and functions) of IT Park, the following circumstances should be analyzed:

- коррупционное правонарушение, совершенное сотрудником IT Park;
- наличие искусственных препятствий для физических и юридических лиц при осуществлении деятельности (задач и функций) Министерством или другими вышестоящими органами;
- несвоевременное принятие решения, необоснованное принятие решения в оперативном порядке;
- внесение заведомо ложных сведений в документы, электронные базы данных;
- конфликт интересов при осуществлении служебных полномочий;
- наличие при осуществлении полномочий таких обстоятельств, как местничество, покровительство, клановость.

6.3.5. The level of corruption risks in the activities (tasks and functions) of IT Park is assessed according to the following criteria:

Low;

Medium;

High.

6.3.6. In the operations of IT Park, a working will develop a corruption risk map for senior management positions, departments, and regional branches in accordance with the outlined in Appendix 1 of this Methodology.

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6.3.7. The assessment of corruption risks shall be carried out based on criteria outlined in Appendix 2 of this Methodology.

6.4 Measures to eliminate or reduce the level of corruption risks

6.4.1. Measures to eliminate or reduce corruption risks may be implemented in the following forms:

- Development of regulatory and intra-departmental documents aimed at risk mitigation;
- Reduction of human factor and digitization of activities (tasks and functions), ensuring transparency, establishing public oversight;
- Implementation of measures to regulate activities (tasks and functions);
- Maximum limitation of direct contact between employees and individuals;
- Posting and dissemination of information on state procurement conducted by the IT-Park system on the official website and other mass media;
- Simplification of the process of providing public services, removal of unjustified restrictions, excessive administrative procedures, elimination of bureaucratic regulation mechanisms, reduction in the number of submitted documents and decision-making deadlines;
- Conducting explanatory work aimed at combating corruption, holding preventive discussions, propaganda through hotlines and communication channels;
- Monitoring daily, mutual, and full compliance by employees with internal documents on combating corruption and managing conflicts of interest.
- Other measures to eliminate corruption risks that do not contradict the legislation may also be implemented.

6.4.4. The working group-developed "Corruption Risk Maps, Appendix 1, and the Anti-Corruption Program, Appendix 4" are submitted to the appointed person responsible for combating corruption at IT Park for review, necessary amendments, and compilation.

6.4.5. Based on the results of identifying and assessing corruption risks in senior management positions, departments, regional branches, and other processes presented by the Working Group on the development of the anti-corruption management system at IT Park, the designated person responsible for combating corruption develops the consolidated "Corruption Risk Map – Appendix 1," "Anti-Corruption Program – Appendix 4," and "List of Positions with High Corruption Risk – Appendix 3" at IT Park, which are approved by the General Director.

The approved documents, "Corruption Risk Map," "Anti-Corruption Program," and "List of Positions with High Corruption Risk," are provided to the anti-corruption department of the central office of IT Park annually by January 10th.

6.4.6. The anti-corruption department of IT Park will develop a corruption risk map for the IT Park system and upload it to the electronic platform "E-anticor.uz." Based on the risk map, the following documents are automatically generated:

- Anti-Corruption Program of IT Park;
- List of positions at IT Park with high corruption risk.

6.5 Procedure for forming and maintaining an electronic register of corruption-prone relations

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6.5.1. The special unit (working group) of the central office of IT Park, based on proposals submitted by the Agency and the public, enhances the drafts of the corruption risk map and the anti-corruption program of IT Park.

6.5.2. IT Park approves the corruption risk map and the anti-corruption program annually by March 1st through the electronic platform "E-anticor.uz."

6.6 Final provisions

6.6.1. Individuals responsible for violating the requirements of these Guidelines shall be held accountable in accordance with the legislation.

7. Storage

The original versions of this Methodology, in both electronic and paper forms, are kept by the designated person responsible for combating corruption in the activities of IT Park.

8. Records

№	Title of Records	Responsible for maintaining/storing records	Storage		Destruction rule
			Storage location	Storage period	
1	Corruption Risk Map in the activities of IT Park - Appendix 1.	Senior management, department heads, regional branch managers, individuals responsible for combating corruption.	Folders of "Documents on combating corruption"	3 years	Archive
2	Anti-Corruption Program of IT Park - Appendix 3.			3 years	Archive
3	Risk level of receiving/giving bribes and other corruption offenses in the activities of IT Park – Appendix 4.	Individual responsible for combating corruption	Folders of "Documents on combating corruption"	3 years	Archive

9. Appendices

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Appendix 2

CRITERIA
for assessing the level of corruption risk

Level of corruption risk	Criteria
High <u>*</u>	The activities (tasks and functions) of IT Park are not automated.
	The activities (tasks and functions) of IT Park are not regulated.
	Possibility of direct contact with individuals or legal entities in an uncontrolled manner at the workplace.
	Participation of a single person in the preparation, review, and adoption of a draft decision within the activities (tasks and functions) of IT Park.
	A corrupt act was committed in the performance of activities (tasks and functions) of IT Park (the commission of the crime was confirmed by the court).
Medium <u>*</u>	The activities (tasks and functions) of IT Park are partially automated.
	The activities (tasks and functions) of IT Park are partially regulated.
	Possibility of direct contact with individuals or legal entities in an uncontrolled manner at the workplace.
	Participation of two persons in the preparation, review, and adoption of a draft decision within the activities (tasks and functions) of IT Park.
	Presence of information about a corrupt act in the performance of activities (tasks and functions) of IT Park (the commission of the crime has not been confirmed by the court).
Low <u>**</u>	The activities (tasks and functions) of IT Park are fully automated.
	The activities (tasks and functions) of IT Park are fully regulated.
	No possibility of direct contact with individuals or legal entities.
	Participation of three or more persons in the preparation, review, and adoption of a draft decision within the activities (tasks and functions) of IT Park.
	No information about a corrupt act and the fact of committing a corrupt act.

** The assessment of identified risks in the activities (tasks and functions) of IT Park as high or medium level by the special unit (working group) shall be conducted in coordination with the General Director.

** When assessing the level of corruption risk identified in the activities (tasks and functions) of IT Park, if any of the low-level criteria are present, this level of corruption risk shall be assessed as low.

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Appendix 4

Risk level of receiving/giving bribes and other corruption offenses in the activities of IT Park

Structure of IT Park (positions)	Level and number of risks			Number of risks to be managed
	low	medium	high	

Responsible for combating corruption in IT Park

(signature) (full name)