

METHODOLOGY
for forced identification and
assessment of corruption risks, and
their reduction in the subdivisions of
the executive office, as well as the
structural divisions of
JSC “Almalyk MMC”

Chapter 1. Introduction

This Methodology, developed in accordance with the Resolution of the President of the Republic of Uzbekistan dated May 11, 2022 "On measures to improve the mechanisms for eliminating corruption risks in the field of state administration and expanding public participation in this area" PP-240, also by the Resolution of the Anti-Corruption Agency and the Ministry of Justice dated August 31, 2022 No. 3383 "On approval of the methodology for identifying and assessing corruption risks in the activities of governmental and administration authorities and other organizations", determines the tasks and functions assigned to the Members of Board, subdivisions of the Executive Office, as well as structural divisions of JSC "Almalyk Mining and Metallurgical Combine" (hereinafter referred to as the Combine), as well as the unified procedure and approach for developing the activities aimed at identifying, assessing the level of propensity for corruption risks, forming their list and implementation mechanisms, forming a chart of corruption risks, prevention or minimization.

Chapter 2. General

1. The objectives of identifying and assessing corruption risks in the activities of the Combine are as follows:

Determine the tasks and functions of the Combine that are mostly prone to corruption risks, and form a list of positions with high corruption risks;

development and monitoring of the implementation of measures to eliminate corruption risks.

2. Based on the results of identifying and assessing corruption risks in the subdivisions of the executive office and structural subdivisions (enterprises and shops) of the Combine, the following documents should be developed:

Chart of corruption risks;

Corruption Counteracting Program;

List of positions with high corruption risks;

Electronic register of relations prone to corruption.

3. This technique uses the following basic concepts:

corruption risks – the ability of an employee of the Combine to commit corrupt acts for legitimate reasons and conditions in order to obtain material or non-material benefits from his career or official position in the interests of personal interests or other persons;

corruption risk chart – a description and level of possible corruption risks associated with the tasks and functions (processes) carried out in the activities of subdivisions and structural divisions (enterprises and economic entities) of the executive office of the Combine, the position responsible for the implementation of functions (processes), regulatory mechanisms, functions (processes), measures and timing for eliminating corruption risks, the level of residual corruption risks;

corruption offense – an act that has signs of corruption, for which the legislation provides for liability for the committed action;

assessment of corruption risks – analysis of the activities (tasks and functions) of subdivisions and structural divisions (enterprises and economic entities) of the executive office of the Combine, identification of existing corruption risks and assessment of the level of these risks;

residual risk is the risk that remains after taking certain measures to eliminate the identified corruption risk;

special unit – the internal control structure responsible for coordinating and controlling anti-corruption work in the executive office and structural divisions of the Combine (in the text – the Compliance Control Service);

The working group is a permanently functioning structure, which is formed in the subdivisions and structural subdivisions of the executive office of the Combine (enterprises and cycles), consisting of senior employees, to identify, assess and reduce corruption risks.

4. Assessment of corruption risks by the divisions of the executive office of the Combine and structural divisions (enterprises and workshops) is carried out annually until February 20.

5. The Corruption Counteracting Agency of the Republic of Uzbekistan (hereinafter referred to as the Agency) has the right to give instructions on improving the activities of the divisions of the executive office of the Combine and structural divisions (enterprises and workshops) to assess and eliminate corruption risks, to prevent shortcomings in this direction.

Chapter 3. Organization of work to identify and assess corruption risks in the activities of the executive office, as well as structural divisions of the Combine

6. Identification and assessment of corruption risks should cover all structural units (department, administration, institutional department, service, sector, Bureau, office, etc.), as well as enterprises and workshops specialized in production and service.

In this case, the identification and assessment of corruption risks in the activities of the divisions of the executive office and structural divisions (enterprises and shops) of the Combine is carried out by the Working Group under the leadership of the chairman of the board of the Combine.

7. Members of the Working Group are formed in the composition consisting of members of the management, the first heads of the executive office and structural divisions of the Combine.

The personnel of the Working Group is to be approved by the relevant order of the Chairman of the Board, its activities are coordinated and regularly monitored.

8. When identifying and assessing corruption risks of the divisions of the executive office and structural divisions (enterprises and workshops) of the Combine, the Working Group performs the following tasks:

Personally control the organization, coordination and performance of works to identify and assess corruption risks;

Organization of the development of the chart of corruption risks of divisions of the executive office and structural divisions (enterprises and workshops) of the Combine;

Organization and control of work on the development of projects for divisions of the executive office and programs for combating corruption of structural divisions (enterprises and workshops) of the Combine;

consideration of draft chart of corruption risks and an anti-corruption program developed by subdivisions of the executive office and structural subdivisions (enterprises and workshops) of the Combine, and making proposals for their improvement;

Improvement of the chart of corruption risks of the executive office and structural divisions of the Combine and the draft anti-corruption program based on the proposals of the agency and the public (or independent experts);

Implementation of work to identify and assess corruption risks in the divisions of the executive office and structural divisions (enterprises and individual entrepreneurs) of the Combine directly, with the involvement of an assessment team or independent experts (consulting company) on a contractual basis;

exercising control over the process of assessing corruption risks at a particular enterprise or division on the basis of a voluntary choice;

control over the development of a chart of corruption risks at a particular enterprise or division, coordination of work on the development of a chart, control over its implementation by a specific enterprise or division if the chart project is approved, close practical assistance to the service in preparing a unified / generalized chart of corruption risks at a particular enterprise or division;

organization, coordination of work on the development of draft departmental programs of the Combine or structural unit to combat corruption offenses, control over the implementation of its implementation in the relevant unit (enterprise, shop, department, department, department, service, bureau, sector) in case of approval (departmental) programs, control over the timely and complete preparation of reports;

Close practical and organizational assistance to the service in the preparation of generalized (consolidated) reports of the Combine;

Based on the production situation, based on the requests of the Service, provides ongoing assistance to the Service in the technical, organizational, legal, administrative aspect in preparing additional information, certificates and documents, as well as in performing other tasks in the field of combating corruption.

9. When organizing the work to identify and assess the corruption risks of the Combine, the Compliance Control Service in the executive office performs the following tasks:

provides methodological and practical assistance to the Working Group in organizing the work to identify and assess corruption risks;

provides methodological and practical assistance to the Working Group in developing the chart of corruption risks and draft anti-corruption programs;

organizes the work on risk assessment in the areas of activity of the Combine, as well as in the context of departments and enterprises with the involvement of persons responsible for combating corruption offenses, as well as other employees and specialists of the Combine;

coordinates the assessment of corruption risks in the subdivisions and structural divisions of the executive office (enterprise and workshop) of the Combine and exercises control over it;

Responsible person for combating corruption violations in the subdivisions of the executive office and structural subdivisions (enterprises and workshops) of the Combine, provide the executive office and structural subdivisions of the Combine with advice, recommendations and instructions on following the procedures provided for in this Methodology;

organizes the work of subdivisions of the executive office and structural subdivisions (enterprises and workshops) of the Combine for compiling the chart of corruption risks (prepares an appropriate draft order) and submits it to the chairman of board for approval;

summarizes the risk chart developed (compiled) in the context of subdivisions of the executive office and structural divisions (enterprises and workshops) of the Combine;

provides the heads of divisions of the executive office and structural divisions (enterprises and workshops) of the Combine with the results of risk assessment to ensure the implementation of a generalized chart of corruption risks, also controls its implementation;

considers draft programs for combating corruption offenses developed by subdivisions of the executive office and structural subdivisions (enterprises and workshops) of the Combine on the basis of a chart of confirmed risks, and makes suggestions and recommendations on the advisability of their adoption or their improvement;

develops a generalized (consolidated) program to combat corruption offenses of the Combine on the basis of departmental programs to combat corruption offenses by divisions of the executive office and structural divisions (enterprises and workshops) of the Combine;

coordinates the activities of the divisions of the executive office and structural divisions (enterprises and workshops) of the Combine to minimize corruption risks and controls their implementation;

The compliance control service may also perform other tasks in accordance with legislative acts.

If necessary, the Compliance Control Service will require additional information and documents on combating corruption offenses from the responsible persons of the executive office and structural divisions.

Chapter 4. Procedure for identifying and assessing corruption risks

10. The characteristics of the activities (tasks and functions) of the subdivisions of the executive office and structural divisions (enterprises and workshops) of the Combine, as well as the tasks and functions of workers and management personnel at all levels, are compiled in accordance with Appendix 1 to this Methodology.

11. Existing corruption risks in the activities of the executive office and structural divisions (tasks and functions), as well as in the tasks and functions (job descriptions) of employees and management personnel in all divisions are identified on the basis of internal and external data sources.

12. Internal sources of information are:

The legal basis for the activities (tasks and functions) of the divisions of the executive office and structural divisions (enterprises and workshops) of the Combine;

Regulatory legal acts and internal regulations governing the functions of the divisions of the executive office and structural divisions (enterprises and workshops) of the Combine;

internal audit materials, including official inspection materials;

Minutes of the meeting of the Commission on Ethics and Conduct of the Combine;

Monitoring the results of anti-corruption work in the divisions of the executive office and structural divisions (enterprises and workshops) of the Combine;

the results of surveys, as well as sociological research on the activities (tasks and functions) of state organizations conducted by the Compliance Service or other structural units, including sociological research, etc.;

the results of surveys, as well as sociological research on the activities (tasks and functions) of state organizations conducted by the Compliance Service or other structural units, including sociological research, etc.

13. External information sources consist of:

Appeals (messages) and statistical data on violations of the activities of workers and managers of the executive office and structural divisions of the Combine;

the results of surveys conducted by the agency or other state organizations on the issues of activities (tasks and functions) of the state organization, including sociological research;

Materials provided by law enforcement or judicial authorities, etc.

14. When determining corruption risks in the activities (tasks and functions) of the executive office and structural divisions, as well as all workers and employees of the Combine, regardless of their position, the Working Group and the assessment group should analyze the following circumstances:

Cases and facts of corruption offenses committed by an employee of the Combine;

The presence of artificial barriers for individuals and legal entities in the implementation of activities (tasks and functions) by the executive office and structural

divisions, as well as by all workers and employees of the Combine, regardless of their position;

facts of untimely decision-making, making an unreasonable operational decision;

entering deliberately false data into documents, cases of electronic databases;

cases of a conflict of interest, admitted by the employees and managers of the Combine in the exercise of their official powers;

The presence of such negative conditions as localism, grouping, sponsorship, kinship, clanism, acquaintance, favoritism, nepotism, cronyism in the exercise of their official powers by workers and employees, as well as the leaders of the Combine.

15. The level of corruption risks in the activities (tasks and functions) of the executive office and structural divisions, as well as all workers and employees of the Combine, regardless of their position, is assessed in the following measurements:

short;

average;

high.

16. Assessment of the level of corruption risks by the Working Group is carried out on the basis of the criteria given in Appendix 2 to this Methodology.

Chapter 5. Measures to eliminate corruption risks

17. Measures to eliminate corruption risks can be carried out in the following forms:

development of draft normative legal acts and internal regulatory documents;

ensuring the human factor reduction and digitalization, transparency, accountability and openness of activities (certain tasks and functions, as well as powers) of the Combine, effective and systematic establishment of control over the public and the media;

taking measures to regulate the activities (tasks and functions) of the executive office (departments, directorates, sections, services, sectors, bureaus, offices, etc.) and structural subdivisions (enterprises, workshops, etc.), as well as all officials and workers and employees, regardless of the position held by the plant;

maximum restriction of direct uncontrolled and informal communication of the heads of all departments, workers and employees of the Combine with individuals, citizens, as well as business entities;

ensuring the full placement and prompt dissemination of information about investment projects, construction and contract work, public procurement, selection of candidates for vacancies, changes in positions of employees or rotation carried out by the Plant on the official website and other media (including social networks);

simplifying the process of providing public services by the Combine, eliminating unreasonable restrictions, excessive administrative procedures, eliminating bureaucratic regulatory mechanisms, reducing the number of documents submitted and the timing of decision-making;

on the personal initiative of the heads of the executive office and structural divisions of the Combine, regular and systematic explanatory work aimed at combating corruption, regular appearances in the media and social networks, conducting preventive conversations with the population and employees, receiving representatives of citizens and business

entities at "open doors", regular propaganda and promotion of hotlines and communication channels specially organized to combat corruption;

exercising control over the implementation of daily, mutual and full compliance with internal documents on combating corruption and conflicts of interest by workers who are subordinate to their members of the board, the first heads of structural units (enterprises, workshops, departments, directorates, divisions, services, offices, bureaus, etc.); d.);

Members of the Management Board, heads of structural subdivisions (enterprises, workshops, departments, directorates, sections, services, offices, bureaus, etc.), members of the Working Group and the Assessment Group may take other measures that do not contradict legislative acts to prevent corruption risks.

18. Work on assessing the level of residual risks is carried out on the basis of the measures specified in paragraph 16 of this Methodology for eliminating corruption risks, based on the criteria given in Appendix 2 to this Methodology.

19. The working group and the assessment group develop a draft chart of corruption risks of the executive office of the Combine in accordance with the form in accordance with Appendix 3 to this Methodology.

20. Members of the management, structural units (enterprises, workshops, departments, directorates, sections, services, sectors, offices, bureaus, etc.) develop draft charts and anti-corruption programs in the form in accordance with Appendix 4 to this Methodology in accordance with Appendix 3 to this Methodology.

At the same time, these projects, as well as all supporting documents, are submitted to the Working Group and the Compliance Control Service, which is its secretariat.

21. Based on the results of identifying and assessing all (tasks and functions) corruption risks in the activities of the executive office and structural divisions (enterprises, workshops, departments, directorates, sections, services, sectors, offices, bureaus, etc.) of the Combine, the Group on assessment, a generalized (consolidated) chart of corruption risks of the Combine is being developed, which will be annually entered into the electronic platform "<https://e-anticor.uz/site/login>" by January 10.

22. Based on the corruption risk chart posted on the electronic platform, the "<https://e-anticor.uz/site/login>" assessment team automatically generates the following documents:

Anti-Corruption Program of Almalyk MMC JSC;

List of positions with high corruption risks of Almalyk KMK JSC.

Chapter 6. The procedure for the formation and maintenance of an electronic register of relations prone to corruption

23. Based on the draft chart of corruption risks of Almalyk MMC JSC, posted on the electronic platform "<https://e-anticor.uz/site/login>", the Agency automatically generates an electronic register of relations with a tendency to corruption.

24. The draft electronic register of relations prone to corruption is posted by the Agency on the website <https://e-anticor.uz/site/login> for a period of at least fifteen days for public discussion.

25. The Agency, within ten days from the date of completion of the discussion, sends generalized proposals based on the results of public discussion to Almalyk MMC JSC through the electronic platform <https://e-anticor.uz/site/login>.

26. The working group of Almalyk MMC JSC, on the basis of proposals made by representatives of the Agency and the public, improves the draft chart of corruption risks and the anti-corruption program of the Combine.

27. Until February 20, the Chairman of the Board annually approves the corruption risk chart and the anti-corruption program through the electronic platform "<https://e-anticor.uz/site/login>".

Chapter 7. Final Provisions

28. Persons guilty of violating the requirements of this Methodology shall be liable in the manner prescribed by legislative acts.

APPENDIX 1

to the Methodology for forced identification and assessment of corruption risks, and their reduction in the subdivisions of the Executive Office (departments, directorates, sections, services, sectors, offices, bureaus, etc.), as well as structural subdivisions (production and service enterprises and workshops) of JSC “Almalyk MMC”

CHARACTERISTIC of activities (tasks and functions) of Almalyk MMC JSC

No.	Description of function	Process performed in the framework of the function	List of persons responsible for the implementation of the processes (their full name, position, personnel number, telephone number)
1. Name of state organization JSC “Almalyk MMC”			
1.1. Structural subdivision of the state organization Consumer Products Administration			
1.1.1.			

APPENDIX 2

to the Methodology for forced identification and assessment of corruption risks, and their reduction in the subdivisions of the Executive Office (departments, directorates, sections, services, sectors, offices, bureaus, etc.), as well as structural subdivisions (production and service enterprises and workshops) of JSC “Almalyk MMC”

CRITERIA Assessment of Corruption Risk Level

Corruption Risk Level	Criteria
High*	Activities (tasks and functions) of state organization are not automated
	The activities (tasks and functions) of state organization are not put in order
	There is the possibility of direct communication with individuals or legal entities at the workplace in an uncontrolled manner
	Participation of one person in preparation, consideration and adoption of a draft decision within the framework of the activities (tasks and functions) of state organization
	When performing activities (tasks and functions) of state organization, a corrupt act was committed (the commission of a crime was approved by the court)
	Activities (tasks and functions) of state organization are partially automated

Middle*	The activities (tasks and functions) of state organization are partially put in order
	There is the possibility of direct communication with individuals or legal entities at workplace in a controlled manner
	Participation of two persons in the preparation, consideration and adoption of a draft decision within the framework of the activities (tasks and functions) of state organization
	When performing activities (tasks and functions) of state organization, there is information about the commission of a corrupt act (the commission of a crime was not approved by the court)
Low*	Activities (tasks and functions) of state organization are fully automated
	The activities (tasks and functions) of state organization are fully put in order
	There is no possibility of direct communication with individuals or legal entities at the workplace in a controlled manner
	Participation of three or more persons in preparation, consideration and adoption of a draft decision within the framework of the activities (tasks and functions) of state organization
	there is no information about the commission of a corruption act

*Assessment of the risk identified by the Working Group in the activities (tasks and functions) of state organization is carried out in coordination with the Chairman of the Board.

** If there is one of the low-level criteria in assessing the risk identified by the Working Group in the activities (tasks and functions) of Almalyk MMC JSC, the level of that corruption risk is assessed at a low level.

APPENDIX 3

to the Methodology for forced identification and assessment of corruption risks, and their reduction in the subdivisions of the Executive Office (departments, directorates, sections, services, sectors, offices, bureaus, etc.), as well as structural subdivisions (production and service enterprises and workshops) of JSC “Almalyk MMC”

CHART Of Corruption Risks in the Activities of _____

№	Characteristic of corruption risk	Level (high, medium, low) of corruption risk	Position of person responsible for implementation of functions (processes)	Mechanism to put functions (processes) in order	Measures to prevent corruption risks	Level (high, medium, low) of residual corruption risk	Responsible persons
	1. Name of structural subdivision*						
1.	1. Name of the function of the state organization						
	1. Name of relationships related to functions						
	1. Name of process						
	2. Name of process						
	2. Name of structural subdivision *						
2.	1. Name of the function of the state organization						
	1. Name of relationships related to functions						
	1. Name of process						
	2. Name of process						

APPENDIX 4

to the Methodology for forced identification and assessment of corruption risks, and their reduction in the subdivisions of the Executive Office (departments, directorates, sections, services, sectors, offices, bureaus, etc.), as well as structural subdivisions (production and service enterprises and workshops) of JSC “Almalyk MMC”

PROGRAM
Of Counteracting the Corruption at JSC “Almalyk MMC”

[illegible]