



IMPROVING THE LEGAL FRAMEWORK FOR MANAGING CONFLICTS OF INTEREST IN THE PUBLIC SECTOR OF THE REPUBLIC OF UZBEKISTAN

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Abstract: This article examines the issues of forming a legal framework for managing conflicts of interest in the Republic of Uzbekistan. In particular, international standards for resolving conflicts of interest were analyzed, causal conditions that impede the prevention of situational conflicts of interest, issues that prevent a full fair assessment of conflict situations, scientific and theoretical aspects for resolving personal and other interests, ways to distinguish between the qualifications of bribery and conflicts of interest, a comparative analysis of national and foreign legislation in this area was carried out, an analysis of the results of testing in the Ministry of Justice of the Republic of Uzbekistan was carried out, and the legislative establishment of restrictions on the prevention of conflict situations for public servants was argued.

Key words: conflict of interest, personal interest, related parties, corruption, ISO 37001, declaration of conflict of interest.

I. Introduction

The presence of nepotism, clannishness, localism and favoritism in the activities of a government body is the main sign of a low level of perception of corruption in this sector.

With the adoption of the UN Convention against Corruption in 2003, full-scale work began on its implementation in each state that became parties to this Convention. In particular, each State Party must establish, maintain and strengthen systems that promote transparency and prevent the emergence of conflicts of interest, which is one of the preventive instruments of the above Convention.

The Republic of Uzbekistan, on an equal basis with other countries, has noted this task as an integral part of the anti-corruption policy pursued in the country. In turn, the President of the country Sh. Mirziyoyev in his Message to the Oliy Majlis dated December 29, 2020, placing special emphasis in this direction, noted that: "Until all segments of the population, the best specialists, are involved in the fight against corruption, until our entire society If, figuratively speaking, we are not inoculated with a "vaccine of honesty," we will not be able to achieve our goals. We must move from eliminating the consequences of corruption to its early warning."¹.

II. Main conception

Due to the specifics and nature of the legal environment of each state, the issue of implementation of this preventive mechanism requires both scientific, legal and practical analysis.

¹ Message from the President of the Republic of Uzbekistan Sh. Mirziyoyev to the Oliy Majlis dated December 29, 2020 – URL: <https://president.uz/ru/lists/view/3324> (accessed: 06.05.2023).

According to the report of the Accounts Chamber of the Republic of Uzbekistan, in 2021 alone, in the process of public procurement, conflicts of interest amounting to 971.1 billion soums were committed in 763 cases and other violations of the law were established, and in order to eliminate problems, more than 30 submissions were made to the relevant ministries and departments².

Researchers X. Leslie, L. Lessig, D.L. Rod, C. Clark, R. Painter, S. Rose-Ackerman, N.V. Prokhorov and P.S. Jani³ on the settlement of conflicts of interest, emphasizing the peculiarity of legislative enshrinement of requirements regarding the prevention of conflicts of interest in the public sector, point to the special role of defining the meaning of “personal interest” and “related persons”. The significance of these two definitions, according to scientists, lies in determining the breadth of the “conflict of interest”, which, if unresolved, is assessed by the international community as a corrupt act.

In the scientific literature, many scientists interpret the concept of “personal interest” differently. For example, according to A. Smith, from the interconnection of personal interests arises the general interest inherent in a market economy⁴.

I. Kant, regarding the concept of personal interest, noted: “interest is the pleasure that we associate with the idea of the existence of an object, with the ability to desire,” and if the pleasure from the pleasant and good is associated with interest, then the pleasure from the beautiful, which determines the judgment of taste, “is freely out of all interest”⁵. And according to Hegel, personal interest is “a moment of subjective individuality and its activity... Therefore, nothing is realized apart from interest”⁶.

However, when the concept of “personal interest” of a legal category began to be considered, then in this case the researcher T. Shershen considers it from different positions: firstly, as one of the criteria for distinguishing private and public law; secondly, as an element, prerequisite or goal of subjective law; thirdly, in a narrowly material sense - as “good”, “benefit” and “benefit”⁷.

² Resolution of the Senate of the Oliy Majlis of the Republic of Uzbekistan “On the report on the activities of the Accounts Chamber of the Republic of Uzbekistan for 21.04.2021 № IIC-531-IV – URL: <https://lex.uz/uz/docs/6000483> (accessed: 06.05.2023).

³ Holmes L. (1999) Corruption, Weak States and Economic Rationalism Central and Eastern Europe. Paper presented at the Princeton University, Central European University Joint Conference on Corruption, Budapest, 29 October- 6 November 1999. – URL: <http://www.coc.ceu.hu/holmes.html> (accessed: 06.05.2023).; Lessig L., “Two Conceptions of “Corruption” in Republic, Lost: How Money Corrupts Congress – and a Plan to Stop It (New York: Twelve-Hackette Book Group, 2011): 226–247; Rhode, Deborah L. (2000). In the Interests of Justice. Oxford University Press. ISBN 978-0-19-512188-9.[29]; K. Clark. Ethics, Employees and Contractors: Financial Conflicts of Interest in and out of Government// 62 Ala. L. Rev. 961 (2010-2011). 961-971; Richard W. Painter. Ethics and government lawyering in current times// Hofstra law review. [Vol. 47:965, 2019] – pp. 965-981; Hazard, Geoffrey C. Jr., “Imputed Conflicts of Interest in International Law Practice” (2005). Oklahoma City University law review. Volume 30. pp. 489–512; RoseAckerman S. Corruption and government. The reasons, consequences, reforms / Translation from English O. A. Alyakrinsky. M.: Logos, 2003. 356 p.; Prokhorov N.V., Yani P.S. Anti-corruption compliance in the criminal legal field: substantive element. Russian justice, publishing house ANO Editorial office of the magazine “Judge” (Moscow), 2018, № 9, pp. 54-57

⁴ Smith A. An Inquiry into the Nature and Causes of the Wealth of Nations. M.: Eksmo, 2007. 443 p.

⁵ See: Fedorov K.M. Interest as a determining factor in the formation of dialectics in German classical philosophy: (I. Kant, I.G. Fichte). Author's abstract. dis. Ph.D. Philosophy Irkutsk Institute of National Economy. Irkutsk, 1985. p. 27

⁶ See: N.L. Rumyantseva. Factors and patterns of human development in Hegel's concept // Historical and socio-educational thought. 2014. No. 5 (27)

⁷ Shershen T.V. Private and public interest in the contractual regulation of family relations: abstract. dis. ...cand. legal Sciences: spec. 12.00.03 “Civil law; business law; family law; international private law”. – Ekaterinburg, 2002. – P.10.

At the same time, the scientist M. Sambor emphasizes that interest, in contrast to need, which determines the necessity (need) of a subject for a certain good (material or intangible nature), next to such a good also includes the subject's focus on mastering it⁸. Researcher V. Shumilov, in our opinion, gives an erroneous version of reducing "interest" to "needs". That is, to satisfy the personal social needs of the entrepreneur, the interest of making a profit serves. The state's need for resources, which are in short supply, results in an interest in the supply of raw materials from outside.

At the same time, if we are talking about the personal interest of a public servant, then on this issue all scientific researchers and practitioners affirm a single position, that is, it can be any advantage (benefit) for him (her) himself, for his family, parents, friends or loved ones, for persons or organizations with whom he or she has or had business or political relations. Personal interest also includes any financial or public obligation that the public servant incurs.⁹

In turn, the OECD Guidelines on Managing Conflicts of Interest in the Public Service note that "private interests" are not limited to financial or material interests or those interests that directly benefit the public official¹⁰.

However, in our opinion, personal interest should take into account national legal characteristics, that is, the ability of a public servant to benefit (materially), which are recognized by law as offenses or crimes. Based on this, it is proposed to define the concept of "personal interest" as "any benefit or advantage that can be received by an employee of a government body or other organization or persons associated with him, as a result of his direct or indirect decision-making or his other participation in this process."

If the above circumstance characterizes the subject of a conflict of interest, then the subjects are the very interests of the public servant himself, a "person associated with him," namely his close relatives, a legal entity in which these persons are founders, and persons with whom he has business or friendly relations with on the one hand, and on the other, the interests of the government body (state), society and individuals.

However, when considering the circle of "connected persons" in the framework of resolving a conflict of interest, the legal qualification of the action shifts between two corrupt actions, namely "conflict of interest" and "bribery," which can lead to negative consequences in achieving justice. The problem of this situation lies in the "legal error" that may arise when qualifying the actions of a public servant as a result of his making a decision in the interests of third parties who are not his close relatives.

That is, this action (inaction) of a public servant will be regarded as a "conflict of interest", and if he planned to receive personal benefit from this action (inaction) as "bribery". In this case, the subjective side of this action always plays a central role in relation to other signs of this illegal action (inaction).

⁸ Sambor M.A. Interest in law: beyond-theoretical aspects of understanding and implementation: abstract. dis. on health sciences. Ph.D. level legal Sciences: spec. 12.00.01 "Theory and history of power and law; History of political and legal studies." – Kyiv, 2010. – P.11.

⁹ Glazyrin T.S., Kozlov T.L., Kolosova N.M. and others. Conflict of interests in the state and municipal service, in the activities of organizations: causes, prevention, resolution: scientific and practical. allowance ot. ed. A. F. Nozdrachev. M., 2016. pp. 37-39.

¹⁰ OECD Guidelines for Managing Conflict of Interest in the Public Service. – URL: <https://www.oecd.org/gov/ethics/48994419.pdf> (accessed: 06.05.2023).



A separate consideration of this category of persons from close relatives is that the study of corruption cases did not reveal cases where close relatives gave bribes to obtain an undue advantage or benefit.

At the same time, it should be noted that in accordance with the UN Convention against Corruption, the concept of “bribery” means the promise, offer or provision, as well as the solicitation or acceptance by a public official, personally or through intermediaries, of any undue advantage for the official himself or another individual or legal entity, so that this official performs any action or inaction in the performance of his official duties¹¹.

In this regard, the scientific community cites the historical reasons for the emergence of the concept of “conflict of interest” in the legal literature. Namely, if it is impossible to prove clear cases of bribery, there is an alternative in the form of a violation of the rules for resolving conflicts of interest¹², which is still relevant today. For example, in the case of Neil Hamilton, one of the arguments in defense of Hamilton was that he acted on political principles, and his support for Mohammed Fayed would have been the same if he had not benefited from Fayed¹³.

As our research on offenses related to conflicts of interest in the Republic of Uzbekistan shows, in all cases the subjects are the public servant himself or his close relatives. Due to the fact that the legislation establishes the grounds that make it possible to consider entities that have business relationships with government officials as “related persons”.

Based on this, it is proposed to consider only close relatives and legal entities in which the employee of the state body or his close relatives are shareholders or shareholders or managers or members of the management body as “connected persons” of an employee of a government body.

III. Analyses

According to the results of the analysis, it was established that there are some systemic problems and shortcomings in this area, in particular:

- despite the fact that the legislation provides for an explanation of the concept of “conflict of interest”, government bodies and institutions do not have clear mechanisms for their implementation and control;

In particular, in the laws “On Public Procurement”, “On Anti-Corruption”, “On Public Private Partnership”, as well as the Model Rules of Ethical Conduct of Public Servants, approved by Resolution of the Cabinet of Ministers on October 14, 2022 No. 595;

¹¹ UN Convention against Corruption. New York, October 31, 2003 – URL: <https://lex.uz/docs/1461327> (accessed: 06.05.2023).

¹² F.M. Popa. Conflict of interest and integrity in public administration in cee countries. comparative analysis//Journal of Public Administration, Finance and Law. National University of Political Studies and Public Administration. Bucharest, 4/2013 – pp.55-67; Strier, F. (2005). Conflicts of Interest in Corporate Governance. Journal of Corporate Citizenship, 2005(19), 79–89; Peter J. Henning, Public Corruption: A Comparative Analysis of International Corruption Conventions and United States Law, 18 Ariz. J.Int'l. & Comp. L. 739 (2001). – pp.794-865; Lessig L., “Two Conceptions of “Corruption” in Republic, Lost: How Money Corrupts Congress – and a Plan to Stop It (New York: Twelve-Hackette Book Group, 2011): 226–247; Rhode, Deborah L. (2000). In the Interests of Justice. Oxford University Press. ISBN 978-0-19-512188-9.[29]; K. Clark. Ethics, Employees and Contractors: Financial Conflicts of Interest in and out of Government// 62 Ala. L. Rev. 961 (2010-2011). 961-971; Richard W. Painter. Ethics and government lawyering in current times//Hofstra law review. [Vol. 47:965, 2019] – pp. 965-981; Hazard, Geoffrey C. Jr., “Imputed Conflicts of Interest in International Law Practice” (2005). Oklahoma City University law review. Volume 30. pp. 489–512;

¹³ See.: Kaye R.(2007) Corruption versus conflict of interest: The British experience. ESRC Center For Analysis of risk and regulation London School of economics and political science. – URL: <http://home.iscte-iul.pt/~ansmd/CC-Kaye.pdf> (accessed: 06.05.2023).

- there is no competent body to formulate a unified practice for preventing and resolving conflicts of interest;
- there is no practice of communicating interests that contradict or may contradict the interests of employees of government organizations;
- government organizations do not have an effective legal mechanism for preventing, identifying and regulating conflicts of interest;
- there are no legal grounds for invalidating contracts concluded in the event of a conflict of interest;
- the norm of the Law “On Combating Corruption” providing for the liability of employees of state bodies, as well as their managers, who violate the requirements for preventing or eliminating conflicts of interest is not implemented in the legislation on administrative liability.

Due to the presence of problematic situations in the legislation, it does not exclude the question of the need to resolve conflicts of interest in the public sector, at least at the departmental level.

In accordance with the international standard ISO 37001:2016 “Anti-corruption management systems”, an organization must identify and assess the circumstances of corruption in its activities, i.e. the risk of a conflict of internal and external interests.

According to the experience of foreign countries, in some countries (Czech Republic, Latvia, Croatia, Georgia, Canada, Slovakia, Poland, etc.) ¹⁴ conflicts of interest are regulated by separate laws. In particular:

The Law of the Czech Republic “On Conflicts of Interest” defines the responsibilities of government officials to prevent, identify, and eliminate conflicts of interest and the activities of responsible departments.

The Law of the Republic of Latvia “On the Prevention of Conflicts of Interest in the Activities of Public Servants” provides for certain measures to regulate conflicts of interest and restrictions for public servants. The Anti-Corruption Bureau is designated as the competent authority to resolve conflicts of interest.

The Law of the Republic of Croatia “On the Prevention of Conflicts of Interest” defines the duty of public servants to report conflicts of interest, the creation and operation of

¹⁴ Law of the Czech Republic “On Conflicts of Interest” – URL: <https://www.psp.cz/en/docs/laws/2006/159.html> [accessed: 24.03.2023 r.]; Law of the Republic of Latvia “On preventing conflicts of interest in the activities of public servants” – URL: <https://likumi.lv/ta/en/en/id/61913> [accessed: 24.03.2023 r.]; Croatian Law “On the Prevention of Conflicts of Interest” – URL: https://rai-see.org/php_sets/uploads/2015/06/Croatia_Law-on-prevention-of-Conflict-of-Interest_2011_en.pdf [accessed: 24.03.2023 r.]; Law of Georgia “On Incompatibility of Interests and Corruption in Public Service” – URL: <https://matsne.gov.ge/ru/document/view/33550> [accessed: 24.03.2023 r.]; Canada's Conflict of Interest Act – URL: <https://laws-lois.justice.gc.ca/eng/acts/c-36.65/fulltext.html#:~:text=4%20For%20the%20purposes%20of,further%20another%20person's%20private%20interests> [accessed: 24.03.2023]; Law of Slovakia “On the protection of public interests in the performance of public functions by persons entrusted with them” – URL: https://europam.eu/data/mechanisms/COI/COI%20Laws/Slovakia/2.%20Law%20No.%20357%20of%202004_SL_O.pdf [accessed: 24.03.2023 r.]; Law of the Republic of Poland “On Restrictions on Economic Activities of Persons Performing State Functions” – URL: https://europam.eu/data/mechanisms/COI/COI%20Laws/Poland/2.%20Act%20on%20Restrictions%20on%20Conduct%20of%20Business%20Activities%20by%20Persons%20Performing%20Public%20Functions%20of%202019_POL.pdf [accessed: 24.03.2023 r.]

the Commission on Conflict of Interest, as well as disciplinary measures for non-compliance with this law.

The Law of the Republic of Georgia “On Incompatibility of Interests and Corruption in Public Service” provides for the obligation of public servants to report conflicts of interest and take measures to resolve them, as well as to protect the integrity of those who report cases affecting the public interest and the reputation of a public institution.

The Conflict of Interest Act of the **Republic of Canada** obliges public servants not to use information revealed during employment, decision-making and public service for their own benefit, measures to prevent conflicts of interest, the powers and responsibilities of the Conflict of Interest and Ethics Officer, and violations thereof law, responsibility is defined.

The Law of the Republic of Slovakia “On the Protection of Public Interests in the Performance of State Functions by Persons Entrusted with them” provides for punishment for violation by a public servant of the obligation to submit a notification of the presence of a conflict of interest, subject to a fine in the amount of a monthly salary.

The Law of the Republic of Poland “On Restrictions on the Economic Activities of Persons Performing Public Functions” stipulates that the head of state, ministers, members of parliament and public servants cannot hold managerial or supervisory functions in public or private companies, or own more than 10% of shares in them. If government employees violate conflict of interest restrictions, they face penalties ranging from reprimand to removal from office. The Committee on Regulations and Affairs of Deputies performs the functions of an executive body for deputies; similarly, for public servants, this function is assigned to the Disciplinary Commission of a state body.

IV. Approbation

Due to the presence of gaps in the legislation on resolving conflicts of interest, the study examined the experience of implementing at the departmental level, namely in the system of the Ministry of Justice of the Republic of Uzbekistan, mechanisms for managing conflicts of interest based on the international standard ISO 37001.

In particular, in the system of the Ministry of Justice, the following procedure has been established for reporting conflicts of interest to employees: ¹⁵:

1. Initial disclosure of conflicts of interest of candidates for vacant positions in judicial bodies and institutions, as well as employees upon their appointment and rotation;

The initial disclosure of conflicts of interest of candidates for vacant positions in judicial bodies and institutions, as well as employees when they are appointed to positions and rotated, is carried out by submitting the following documents:

information about close relatives, related persons, legal entities in which the employee and/or his close relatives own shares of the authorized capital, about the participation of the employee and/or his close relatives who hold a leadership position in non-governmental non-profit organizations;

statement about the presence/absence of a conflict of interest during hiring.

When appointed to a position and performing official duties, a public servant is obliged to declare the existence or possibility of having a personal interest that affects or may affect the proper performance of his official duties.

¹⁵ Regulations on the management of conflicts of interests in the system of the Ministry of Justice approved by order of the Minister of Justice of the Republic of Uzbekistan dated February 24, 2022.– URL: <https://adliya.uz/uzb/inner-page/korrupsiyaga-qarshi-kurashish-boyicha-idoraviy-huj> [accessed: 24.03.2023 r.]

However, in this case, as an analysis of practical work with personal data and situational conflicts of interest has shown, it can be said that a number of factors that may contribute to a conflict of interest are not taken into account. Namely, whether the person works for another organization or owns a business, is a member of another organization, is affiliated with or has other personal relationships, etc.

2. Annual disclosure of information about conflicts of interest (annual declaration) is carried out in the following order:

all employees of justice bodies are obliged, once a year, to notify the Human Resources Department (department) about the emergence or absence of a conflict of interest, taking into account the events and changes that occurred during the reporting period;

Every year, before February 15, employees of justice bodies and institutions are required to fill out the declaration completely and accurately;

Every year, before March 10, an analysis of received statements on the presence/absence of a conflict of interest is carried out to identify employees who indicated the presence of a conflict of interest;

The Ethics Commission, with the participation of the employee's immediate supervisor and the employee (if necessary), before March 20, reviews cases of conflict of interest and develops measures to resolve situations characterized by a conflict of interest, or decides that there is no conflict of interest;

Electronic data on situations of conflict of interest are collected and stored until March 25.

If a conflict of interest is identified, informs the employee's immediate supervisor in writing about this conflict of interest and the need to take measures to resolve it;

the employee's immediate supervisor, within 5 (five) working days from the receipt of information, takes measures to resolve the conflict of interest;

information about an identified conflict of interest of an employee is considered on the agenda of a meeting of the Ethics Commission of a judicial body or institution to consider the sufficiency and adequacy of the measures taken to resolve the conflict of interest.

As a result of the analysis of the declared data of more than 6,000 employees, no cases of conflict of interest were identified that needed to be resolved. However, the process of drawing up a declaration of conflict of interest, due to the fact that it is carried out in writing, is proposed to switch to an electronic version of its registration. At the same time, a declaration form must be filled out upon hiring, upon appointment to another job, and annually it is proposed to develop a unified declaration form on conflict of interest.

3. Disclosure of information regarding the occurrence of a real conflict of interest is carried out when an employee of state bodies and other organizations is obliged to fill out and submit a notification in the established form to his immediate supervisor (the head of the state organization - senior manager) or a special department within one working day from the moment he became aware of a real conflict of interest in the following situations:

close relatives with direct subordination were hired or persons related to him were involved in his work;

participate in decision-making on issues related to the personal interests of related persons;

he became aware of the fact that a close relative works as a responsible official in the direction of the inspection in the inspected object or this inspection is carried out in relation to the object, which is a person related to him.

he became aware of any other real conflicts of interest.

Based on the results of studying cases of conflict of interest in the Ministry of Justice for 2018-2022, not a single case of conflict of interest was identified.

However, the presence of minimum requirements for resolving conflicts of interest is not an indicator of a full settlement of conflicts of interests that need to be resolved. In this case, it is necessary to separately consider the legislative codification of restrictions that are aimed at preventing conflicts of interest and subsequent corruption.

IV. Restrictions to prevent conflicts of interest

Public servants should not carry out activities, as well as hold positions, that are incompatible with the proper performance of their official duties, or that cause harm to them.

In this case, it is not clear which positions are incompatible with the proper performance of their official duties, or harmful to them?

In turn, the legislation of the Republic of Uzbekistan also establishes restrictions to prevent conflicts of interest. For example, in accordance with Resolution of the Cabinet of Ministers of the Republic of Uzbekistan dated March 6, 1992 No. 103 ¹⁶, a list of officials who are prohibited from engaging in entrepreneurial activities was approved.

In addition, in accordance with the Law of the Republic of Uzbekistan "On Family Business," it is established that officials of government bodies, as well as other persons who are prohibited by law from engaging in entrepreneurial activities, cannot be participants in a family enterprise.

The basis for establishing this type of restriction is the Law of the Republic of Uzbekistan "On Guarantees of Freedom of Entrepreneurial Activities" ¹⁷, which establishes that state bodies (except for cases provided for by law), their officials, as well as other persons who are prohibited by law from engaging in entrepreneurial activities, cannot be subjects of entrepreneurial activity.

That is, as the above law establishes, entrepreneurial activity (entrepreneurship) is an initiative activity carried out by business entities in accordance with the law, aimed at generating income (profit) at their own risk and under their own property responsibility.

And business entities (business entities) are legal entities and individuals who have passed state registration in the prescribed manner and carry out business activities.

At the same time, it should be noted the experience of countries such as Germany, China and the USA¹⁸, which took a different path, namely by tightening disciplinary measures, penalties and criminal penalties for corruption abuses provided for by codes of ethics. A similar situation exists in Norway, Thailand, and Switzerland.

¹⁶ Resolution of the Cabinet of Ministers of the Republic of Uzbekistan dated March 6, 1992 No. 103 "On the list of officials who are prohibited from engaging in entrepreneurial activities" – URL: <http://old.lex.uz/docs/398592> [accessed: 24.03.2023 г.]

¹⁷ Law of the Republic of Uzbekistan "On guarantees of freedom of entrepreneurial activity" – URL: <http://old.lex.uz/docs/2006777> [accessed: 24.03.2023 г.]

¹⁸ T. N. Kogol, O. V. Antsibalova System of payment and incentives for civil servants in some foreign countries (Germany, USA) Modern administrative reforms: monograph. – 2nd ed., revised. and additional – M., 2007 – pp. 121-127.

In particular, in Poland, restrictions on participation in entrepreneurial activity have been established for public servants, namely, they are allowed to have up to 10 percent of shares and 10 percent of shares in commercial organizations.

If we consider example cases related to a conflict of interest, we can establish that entrepreneurial activity is the subject or means of obtaining illegal income by a government employee. For example, the “Single Customer Service” under the khokimiyat of the Andijan region gave orders for the reconstruction of schools in the Izbaskan and Kurgantepe districts, as well as the Oyim multidisciplinary clinic in the Jalakuduk district to the Milano Biznes Servis company, the total cost of which is estimated at almost 20 billion soums. In turn, the above company, all shares of the contractor company belong to M. Kodirov, who is the head of the Single Customer Service¹⁹.

Based on the above definition, one should also take into account the fact that by establishing restrictions on engaging in entrepreneurial activities, the issue of limiting participation in this activity by a legal entity is not established, which today has become a relevant form of introducing administrative liability in relation to conflicts of interest.

V. Result

Based on the above, we can conclude that the legislative establishment of the procedure for managing conflicts of interest based on the results of the analysis of scientific and practical works will make it possible to effectively build an anti-corruption system at its initial stage. And also, establishing restrictions to prevent conflicts of interest in areas assessed with high corruption risks will make it possible to resolve them much more effectively, since it is costly.

¹⁹ The Andijan prosecutor's office began checking the facts of a possible conflict of interest in government contracts. – URL: <https://podrobno.uz/cat/obchestvo/andizhanskaya-prokuratura-zanyalas-proverkoy-faktov-vozmozhnogo-konflikta-interesov-pri-goszakazakh/> [accessed: 24.03.2023 г.]

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