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**Rethinking Anti-
Corruption Governance
in Uzbekistan**

by Kodir Kuliev and
Niginakhon Saida

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Rethinking Anti-Corruption Governance in Uzbekistan

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Executive summary

Uzbekistan's anti-corruption efforts are moving from the initial institutional and legislative expansion to a more complex phase of governance consolidation. While the country has demonstrated stable progress since the change of government in 2016, reflected in its improvement in international ratings, recent stabilization suggests that further improvements depend on strengthening implementation rather than introducing new legislation.

This Policy Brief explores Uzbekistan's anti-corruption efforts based on international indicators, national statistics, and the anti-corruption policy framework. The findings identify several structural challenges, including underdeveloped preventive mechanisms, limited verification mechanisms, gaps in financial investigation and deterrence, and an incomplete whistleblower protection system. The authors recommend rebalancing policy priorities towards preventive systems, enhancing institutional independence alongside accountability, introducing independent verification tools for conflict-of-interest management, improving asset recovery capacity, and establishing comprehensive whistleblower protection mechanisms. These will contribute to the institutionalization of anti-corruption efforts and increase public trust.

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Introduction

Uzbekistan's Corruption Perceptions Index (CPI) has declined for the second consecutive year since 2012. Released on 10 February 2026 by Transparency International, a global non-governmental organization that works to combat corruption and promote transparency, the index shows a continued decline from 32 points out of 100 in 2024 to 31 points in 2025. The previous decline was marked the year prior when the country's score went from 33 to 32. Uzbekistan's current global ranking stands at 124th out of 182 countries, losing 3 positions from its 121st place in 2024.

However, this decline does not signal a regression from the anti-corruption reforms the country has embraced since the change of government in 2016. Rather, it shows a phase of consolidation. Such paths of progress are common across many nations: early improvements often come with the adoption of new laws and institutions, while further progress depends on strengthening implementation, building institutional credibility, and embedding preventive controls into everyday governance practices. Given this context, Uzbekistan's current reform moment should not be interpreted as a reversal, but rather as a pivotal transition to a more rigorous phase of governance reform. This policy brief examines the structural challenges shaping this phase and argues that the next stage of anti-corruption policy should prioritize preventive measures, institutional accountability, and the integrity of enforcement and reporting systems.

International research on corruption control indicates that, once countries reach this intermediate reform stage, progress slows and becomes increasingly dependent on institutional consolidation rather than legislative expansion. At this stage, improvements in corruption perception usually require stronger preventive governance systems, credible enforcement, and whistleblower protection mechanisms.

This restructuring is also noticeable in the latest policy developments. In late 2025, Uzbekistan introduced a new stage of anti-corruption reform focused on compliance systems, internal controls, and strengthened institutional accountability, which is a "game changer," as it deviates from treating anti-corruption as mere campaigns to embed accountability into everyday administrative practices and to better prevent and detect corrupt acts.

Understanding CPI Dynamics and Stages of Reform

It is important to note that the CPI, which shows perceived public sector corruption based on expert assessments and business surveys, does not reflect short-term fluctuations or the effects of newly implemented legislation.¹ That is, it shows how anti-corruption reforms are experienced in real life, mainly including factors such as the fairness of the legal system, the trustworthiness of law enforcement, the integrity of political leaders, and people's access to justice, not just whether new laws are being introduced.

International experience shows that many countries encounter a “reform plateau” after improving from very low CPI scores to the mid-range, generally between 30 and 40 points. Changes that initially boost scores are usually tied to significant reforms, such as creating anti-corruption agencies, launching high-profile enforcement actions, or strengthening the legal system. However, moving beyond this stage requires bigger structural changes in governance practices, including consistent enforcement of rule of law, stronger preventive controls, and credible accountability mechanisms. In fact, the CPI 2025 report highlights countries such as Uzbekistan that have made long-term progress through sustained political commitment and regulatory efforts, despite starting from low scores. At the same time, it also notes that most countries worldwide have stagnated or regressed in recent years, highlighting the difficulty of translating reform plans into tangible changes in how people perceive corruption.²

Studies support this view, indicating that perception-based indicators tend to respond more significantly to visible enforcement actions and systemic credibility rather than to gradual legislative changes.³ This means that, after initial reforms, continued progress relies less on creating new legislation and more on ensuring existing systems work fairly and transparently. Additionally, studies on corruption tolerance

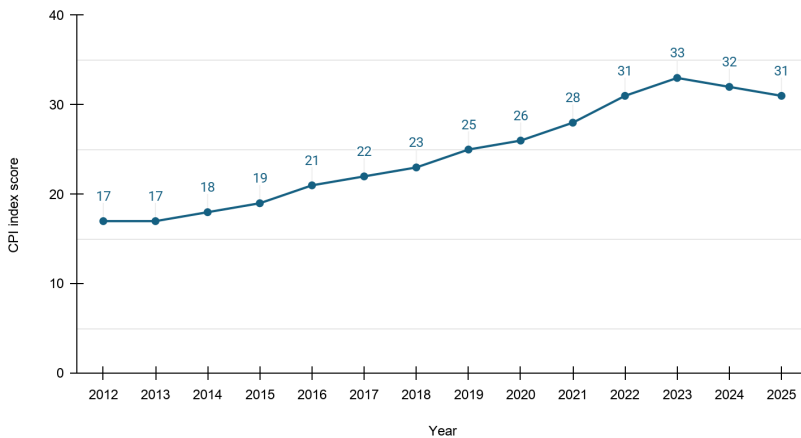
¹ Campos, J. Edgardo, and Vinay Bhargava. “Introduction: Tackling a Social Pandemic.” In *The Many Faces of Corruption: Tracking Vulnerabilities at the Sector Level*, edited by J. Edgardo Campos and Sanjay Pradhan. (Washington, DC: World Bank, 2007), 3–4.

² Transparency International. *Corruption Perceptions Index 2025*. February 10, 2026. <https://www.transparency.org/en/publications/corruption-perceptions-index-2025>

³ Organisation for Economic Co-operation and Development (OECD). *DAC Network on Governance: Synthesis of Lessons Learned of Donor Practices in Fighting Corruption*. DCD/DAC/GOVNET(2003)1. (Paris: OECD, 2003); Kaufmann, Daniel, and Aart Kraay. “Governance Indicators: Where Are We, Where Should We Be Going?” *World Bank Research Observer* 23, no. 1 (2008): 1–30.

indicate that lasting improvements depend on both formal institutions and the broader integrity environment, including informal norms and the reliability of enforcement.⁴ Therefore, while improvements from “very low” to “mid-range” scores can happen quickly, significant improvement in integrity takes a longer time. Stable scores in the low to mid-30s should thus not be seen as a setback but as a transition to a more challenging reform phase focused on credibility and consistency, a trend observed globally, not just in Uzbekistan.

Graph 1. Uzbekistan's CPI Index Score 2012-2025



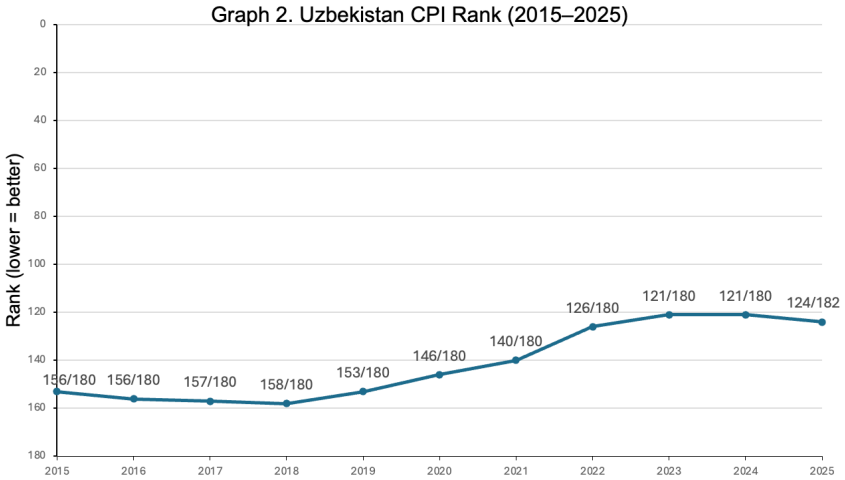
Graph 1.⁵ Uzbekistan's CPI Index Score 2012-2025

⁴ Organisation for Economic Co-operation and Development (OECD). *DAC Network on Governance: Synthesis of Lessons Learned of Donor Practices in Fighting Corruption*. DCD/DAC/GOVNET (2003)1. (Paris: OECD, 2003).

Transparency International. *Corruption Perceptions Index 2025*. Berlin: Transparency International, 2025;

Kaufmann, Daniel, Aart Kraay, and Massimo Mastruzzi. “Governance Matters VIII: Aggregate and Individual Governance Indicators, 1996–2008.” World Bank Policy Research Working Paper No. 4978. (Washington, DC: World Bank, 2009).

⁵ “2025 Corruption Perceptions Index - Explore Uzbekistan's Results”. 2026. transparency.org February 10. <https://www.transparency.org/en/cpi/2025>



Graph 2.⁶ Uzbekistan's CPI Index Rank 2015-2025

While the score of 31 indicates short-term adaptation, the longer trajectory – a rise from 18 in 2014 to 31 in 2025, an increase of 13 points – tells us that real progress had been made rather than what has occurred as short-term changes. This upward trend is also evident in Uzbekistan's global CPI ranking, which improved from 156th out of 180 countries in 2015 to 124th out of 182 in 2025 (see Graph 2). Even the CPI 2025 report highlights that some countries have maintained improvements since 2012, moving up from low rankings to more mid-range scores. This demonstrates that meaningful advances are possible, particularly when reforms focus on legal systems, government structures, and overall governance. However, the report also points out that many countries worldwide have either remained stuck or gone backward, illustrating how challenging it can be to keep moving forward after the initial reforms.⁷

⁶ "2025 Corruption Perceptions Index - Explore Uzbekistan's Results." transparency.org February 10, 2026. <https://www.transparency.org/en/cpi/2025>

⁷ Transparency International. *Corruption Perceptions Index 2025*. Berlin: Transparency International, 2025.
Transparency International. *Corruption Perceptions Index 2014*. Berlin: Transparency International, 2014.

Generally, countries that move from the teens to the low 30s often hit a plateau after their early gains. These initial improvements typically arise from clear structural reforms and institutional changes. Later progress requires strengthening these reforms, building trust, and applying the rules consistently. This pattern appears across many regions and shows the shift from adopting reforms to fully integrating them into the system.⁸ Therefore, the current stabilization should be viewed as a step toward a more complex reform phase, consistent with international experience.

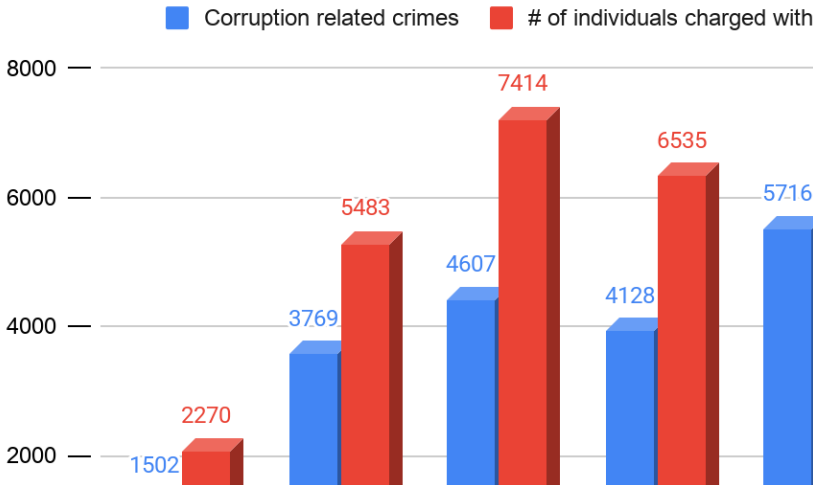
Structural Challenges in Anti-Corruption Governance

Despite improvements in developing anti-corruption legislation and institutions over the past decade, several ongoing challenges continue to hinder effective corruption prevention in the country. These issues are not unique to Uzbekistan; many governments seeking to minimize corruption face similar obstacles as they move from the initial stages of reform to a more stable, established system in the long run. At this stage, progress depends less on adopting new laws and more on enhancing preventive governance frameworks, building institutional credibility, and consistent implementation across public administration.

Enforcement Expansion and Preventive Limitations

Recent statistics show a considerable rise in corruption-related crimes, with recorded cases increasing from 1,502 in 2020 to 5,222 in 2025 (Graph 3). Similarly, the number of people charged with corruption increased from 2,270 to nearly 7,000 during the same period.

⁸ Organisation for Economic Co-operation and Development (OECD). *DAC Network on Governance: Synthesis of Lessons Learned of Donor Practices in Fighting Corruption*. DCD/DAC/GOVNET(2003)1. (Paris: OECD, 2003); Kaufmann, Daniel, and Aart Kraay. "Governance Indicators: Where Are We, Where Should We Be Going?" *World Bank Research Observer* 23, no. 1 (2008): 1–30.



Graph 3.⁹ *Corruption Related Crimes and Number of Individuals Charged with Corruption 2022-2025¹⁰*

The Anti-Corruption Agency of Uzbekistan attributes the sharp increase between 2020 and 2021 partly to the adoption of Resolution No. 829 of the Cabinet of Ministers (31 December 2020). While these trends suggest that law enforcement has become more effective in identifying and addressing corruption, they highlight an important limitation: merely punishing wrongdoers is insufficient for lasting change. International experience shows that, without strong preventive measures in place, just cracking down on corruption will not lead to lasting change.

⁹ “250 dan ortiq hokim yordamchilari korrupsiya uchun javobgarlikka tortildi.” *Kun.uz*. March 13, 2026. <https://kun.uz/79450719>
 “O‘zbekiston korrupsiyaga qarshi kurash reytingida pastladi.” *Kun.uz*. February 11, 2026. <https://kun.uz/37187545>
 O‘zbekiston Respublikasi Korrupsiyaga qarshi kurashish agentligi. “O‘zbekiston Respublikasida korrupsiyaga qarshi kurashish to‘g‘risida milliy ma‘ruza.” <https://anticorruption.uz/uz/article/ozbekiston-respublikasida-korrupsiyaga-qarshi-kurashish-togrisida-milliy-maruza>
 “2025-yilda 5222 ta korrupsiyon jinoyat sodir etildi.” *Gazeta.uz*. February 8, 2026. <https://www.gazeta.uz/oz/2026/02/08/korrupsiya/>

¹⁰ The Anti-corruption Agency of Uzbekistan explains the sudden increase in the number of crimes from 2020 to 2021 with the adoption of Resolution No. 829 of the Cabinet of Ministers dated 31 December 2020 which classified corruption related crimes.

Even domestic policymakers have begun to recognize this imbalance. The Senate Resolution¹¹ from March 2025 emphasized that law enforcement actions have largely centred on detection and response to violations, with further strengthening of preventive strategies recognized as an important next step. When preventive systems are weak, corruption risks tend to adapt to enforcement practices rather than disappear.

In practice, corruption also tends to adapt rather than disappear when faced with increased scrutiny. As stronger oversight becomes more effective in addressing visible violations, risks shift to intricate areas such as procurement, design, and decision-making processes. Thus, strengthening prevention is vital for future reform efforts against corruption.

Institutional Independence and Accountability

Successful anti-corruption standards stress the importance of autonomous and sufficiently resourced preventive institutions. The United Nations Convention against Corruption (UNCAC),¹² the only legally binding universal anti-corruption instrument which Uzbekistan has ratified (having done so in 2008), requires the establishment of anti-corruption bodies with adequate independence, professional capacity, and resources to effectively carry out preventive functions (Articles 5 and 6).

Uzbekistan has created specialized institutions responsible for coordinating anti-corruption policy. However, the institutional framework governing preventive bodies is still evolving. The current institutional framework continues to evolve in areas such as leadership tenure arrangements, appointment and dismissal procedures, and the development of stable budgetary mechanisms that support the operational effectiveness of preventive bodies.

¹¹ O'zbekiston Respublikasi Oliy Majlisi Senati. "O'zbekiston Respublikasi Prezidenti Sh.M. Mirziyoyev tomonidan Korrupsiyaga qarshi kurashish milliy kengashi majlisida belgilab berilgan ustuvor yo'nalishlardan kelib chiqib, O'zbekiston Respublikasi Oliy Majlisining Senati hamda xalq deputatlari mahalliy Kengashlari oldida turgan vazifalar to'g'risida." Resolution, March 17, 2025, SQ-89-V. <https://lex.uz/docs/-7454538>

¹² United Nations Office on Drugs and Crime. *United Nations Convention against Corruption*. New York: United Nations, 2004. https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf

Frequent institutional restructuring and leadership changes can disrupt the continuity of anti-corruption institutions and weaken their ability to develop long-term expertise and institutional memory. At the same time, international standards emphasize that independence must go hand in hand with accountability. Preventive bodies should demonstrate clear results, provide transparent reporting, and be subject to regular oversight.

Strengthening the balance between operational autonomy and institutional accountability is a key necessity of reform.

Conflict-of-Interest Controls and Verification Gaps

Conflict-of-interest regulation is a vital part of modern corruption prevention systems, effectively addressing power abuses. In June 2024, Uzbekistan adopted the Law “On Conflict of Interest” (O’RQ-931), which lays the legal foundation for identifying, disclosing, and managing conflicts of interest in the public sector. The law introduces formal obligations for public officials to disclose potential conflicts, urges institutions to develop internal compliance procedures, and provides mechanisms for recusal and internal review.

This law is a significant step forward in improving integrity safeguards. It clearly defines conflicts of interest and sets out disclosure obligations, bringing Uzbekistan in line with international anti-corruption standards, such as those set out in UNCAC.

At the same time, the effectiveness of conflict-of-interest systems depends not only on disclosure requirements but also on credible verification mechanisms. Right now, conflict-of-interest management mainly relies on internal reporting and institutional review processes within the same organizations where officials operate. While these internal checks are important, they must be complemented by independent verification tools that are common in international best practices. This includes random audits of declarations, cross-referencing of asset and company registries, and establishing external oversight bodies empowered to review potential violations.

Without such validation methods, identifying complex conflicts of interest can be difficult, particularly in situations involving indirect

financial interests, familial ownership structures, or interconnected business entities. Strengthening independent verification procedures and enhancing data-sharing across state registries could significantly enhance the credibility and practical effectiveness of Uzbekistan's conflict-of-interest prevention system.

Financial Damage, Asset Recovery, and Enforcement Effectiveness

Another important part of a reliable and strong anti-corruption strategy is the financial outcomes of enforcement. Successful anti-corruption systems do more than just detect corrupt acts; they also trace, freeze, confiscate, and recover illegal profits. The state's ability to recover corrupt proceeds is a key factor in deterrence, as people are less likely to engage in corrupt activities if they know they will lose their illegal gains (UNCAC Articles 31 and 57).

Data from Uzbekistan highlights both progress in detection and persistent challenges in asset recovery. As discussed above, while the number of corruption-related crimes and the number of individuals charged have increased significantly in recent years (as per Graph 3), according to the Anti-Corruption Agency, this rise from 2020 to 2021 partly comes from better reporting and classification of corruption since Resolution No. 829 of the Cabinet of Ministers from 31 December 2020 improved how these crimes are categorized.

While better detection suggests stronger enforcement, financial indicators reveal a more complex picture. Official data show that the total financial damage associated with corruption-related crimes has grown substantially, reaching approximately USD 324.7 million in 2025 (Table 1). At the same time, the percentage of stolen assets that were recovered has declined markedly, falling from about 71 percent in 2020 to roughly 31 percent in 2025.

Table 1.13 *Financial Damage and Recovery from Corruption-Related Crimes (2020–2025)*

Year	Damage (UZS bln)	Damage (USD mln)	Recovered (UZS bln)	Recovered (USD mln)	Recovery rate (%)
2020	500.1	51	355	36.2	71%
2021	1,282.00	125.5	887	87	69.10%
2022	2,040.00	188.9	1,100.00	101.9	54%
2023	1,400.00	121.7	745	64.8	51%
2024	2,810.00	222	—	—	—
2025	4,200.00	324.7	1,300.00	100.5	30.95%

This trend suggests areas for further strengthening of the financial investigation capacity, asset tracing mechanisms, inter-agency coordination, and management of recovered assets. International research shows that anti-corruption efforts work best when investigators, prosecutors, and financial institutions coordinate their efforts to find and efficiently recover hidden assets.¹⁴

Recovery of illicit earnings is the main factor of deterrence. Individuals engage in corrupt behaviour when the expected rewards outweigh the expected costs. When illicit assets are not effectively confiscated, corruption can remain economically rational even when detection increases. In such circumstances, enforcement may punish offenders but will hardly eliminate the financial reasons behind corruption.

The declining recovery ratio, therefore, raises a critical policy question: are Uzbekistan's enforcement systems capable of tackling the financial dimension of corruption? Strengthening asset recovery mechanisms

¹³ "Korrupsiya tufayli davlat va jamiyat manfaatlariga 1 trillion 282 milliard so'm zarar yetkazildi." Yuz. uz. 10 mart 2022. <https://yuz.uz/uz/news/korrupsiya-tufayli-davlat-va-jamiyat-manfaatlariga-1-trillion-282-milliard-som-zarar-etkazildi>

"2023 yil uchun korrupsiyaga oid jinoyatlar statistikasi ochildi." Qalampir.uz. December 16, 2024. <https://qalampir.uz/uz/news/2023-yil-uchun-korrupsiyaga-oid-zhinoyatlar-statistikasi-ochik-landi-111377>

"O'zbekistonda bir yil ichida korrupsiyadan yetkazilgan zarar 2,81 trillion so'mga yetdi". Frank. uz <https://frank.uz/uz/yangiliklar/ozbekistonda-bir-yil-ichida-korrupsiyadan-yetkazilgan-zarar-281-trillion-somga-yetdi/>
Press Secretary UZ. Telegram post. https://t.me/Press_Secretary_Uz/6928

¹⁴ Svensson, Jakob, "Eight Questions about Corruption." *Journal of Economic Perspectives* 19, no. 3 (2005), pp. 19–42;

OECD. *Committing to Effective Whistleblower Protection*. Paris: OECD Publishing, 2016.

could improve deterrence and public confidence in anti-corruption efforts.

Whistleblower Protection and Reporting Incentives

Prevention matters but thinking corruption can be completely prevented is a dangerous misconception. Corruption is often invisible and adaptive, necessitating scrutiny to detect it. That is why detection is fundamental to any legitimate integrity system.¹⁵ Without it, compliance remains a façade. For this reason, international frameworks stress whistleblower protection as a critical part of prevention systems. The UNCAC encourages States Parties to protect persons who report corruption in good faith from unjustified treatment (Article 33), while OECD guidance highlights the importance of secure reporting channels, protection against retaliation, and effective complaint-handling mechanisms.¹⁶

Uzbekistan has begun strengthening this area. As of May 2026, a draft law on whistleblower protection is being publicly discussed, indicating growing policy attention to the role of reporting mechanisms in curbing corruption. The draft introduces general guarantees of protection and references non-retaliation. At the same time, current laws, including the Law of the Republic of Uzbekistan No. O'RQ-515 (2019) provides for financial incentives to individuals who report certain violations.

However, lessons from other countries suggest that the effectiveness of the whistleblower system depends not only on formal guarantees but also on the structure, credibility, and accessibility of the mechanisms. Successful systems normally include several key elements: confidential and, when necessary, anonymous reporting channels; clear rules for internal and external disclosures; protection against both direct and indirect forms of retaliation; shifting the burden of proof in retaliation cases; and access to remedies, including reinstatement or compensation.¹⁷ Effective systems also protect consultants and contractors, not just the organization staff.

¹⁵ Gorta, Angela. "Research: A Tool for Building Corruption Resistance." In *Corruption and Anti-Corruption*, edited by Peter Larmour and Nick Wolanin. (Canberra: ANU Press, 2001).

¹⁶ United Nations. *United Nations Convention against Corruption (UNCAC)*. 2003.

¹⁷ OECD. *Committing to Effective Whistleblower Protection*. (Paris: OECD Publishing, 2016).

As such, Uzbekistan's evolving strategy may benefit from further development of a more organized reporting system. In particular, strengthening clear reporting channels at different levels (internal, regulatory, and external), clarifying institutional responsibilities for the handling of complaints, and ensuring better coordination among oversight bodies could increase both effectiveness and user confidence. Adding feasible and serviceable protections, such as secure reporting platforms, clear timelines for handling cases, and confidentiality protections, would also make the system practically reliable.

Equally important are the workings of credible protection mechanisms, without which financial rewards alone might be useless for encouraging reporting. While introducing a rewards system can help, international experience shows strong evidence that individuals often hesitate to report corruption or corporate misconduct when potential risks, particularly professional consequences, reputational harm, or personal safety concerns, outweigh expected social or personal benefits.¹⁸ Ultimately, people are more likely to report when they trust the system will protect them and treat them fairly rather than when the monetary reward simply increases.

More broadly, worldwide experience reveals that corruption threats often escalate where decision-making power is concentrated, discretionary power is broad, transparency is limited, and oversight is weak. Effective systemic reform, therefore, requires a change in the economic calculations of the corrupt. Excessive monopoly of powers must be lessened, and competition increased. Discretion and arbitrariness in official actions and in compliance-control systems must be avoided. Transparency and accountability need to be enhanced through objective performance indicators and systematic feedback from citizens, businesses, and public officials. Positive and negative incentives need to be changed for both bribe givers and bribe takers.

Importantly, these challenges should be understood within the broader framework of ongoing reform initiatives and institutional development. Uzbekistan has shown a strong commitment to strengthening governance systems, and current reforms provide a solid foundation for further progress in preventing corruption through systematic strategies.

¹⁸ Transparency International. *International Principles for Whistleblower Legislation*. 2013. OECD. *G20 Compendium of Best Practices and Guiding Principles for Legislation on the Protection of Whistleblowers*. (Paris: OECD Publishing, 2019).

Recommendations

Uzbekistan's recent anti-corruption reform is entering a crucial phase of system performance. Improvements depend, inter alia, on the predictability of institutions' operations, incentives that deter abuses of power, and the credibility of enforcement mechanisms. The following recommendations aim to enhance preventive efforts, strengthen credibility, and adjust the cost-benefit calculus of corruption.

- 1. Rebalance Anti-Corruption Policy Toward Systemic Prevention.** It is important to integrate preventive measures into routine administrative processes rather than relying primarily on detection and punishment. Priority actions include strengthening internal control systems within government institutions, streamlining administrative procedures to limit discretionary powers, and expanding the use of risk-based monitoring in high-risk sectors. Preventive systems should make non-compliance challenging, ensuring integrity is the standard in institutional processes.
- 2. Strengthen Institutional Independence While Ensuring Accountability.** Autonomous, professional, well-resourced and results-accountable institutions are of the highest importance. For that, leadership appointment and dismissal procedures must be clarified and strengthened, stable and predictable budgetary allocations must be ensured, and protection of institutions from undue influence must be assured. At the same time, accountability mechanisms should be enhanced through transparent performance metrics, regular public reporting, and external supervision.
- 3. Introduce Independent Verification Mechanisms for Conflict-of-Interest Control.** Ensure the recently passed conflict-of-interest law is practically effective through independent verification, including risk-based audits of declarations, cross-checking disclosures with tax and asset registries, and allowing oversight bodies to review complex cases. Detecting conflicts of interest requires verification. Government data systems must not remain fragmented. When government data systems are not connected, it becomes hard to spot hidden relationships. By integrating records and enabling cross-checking, authorities can reveal concealed interests. Without independent checks,

disclosure systems may be little more than formalities rather than real protections.

- 4. Strengthen Financial Investigation and Asset Recovery Systems.** To enhance deterrence, enforcement must consistently focus on the financial incentives behind such activities. Detecting violations is insufficient if those engaged in corruption can keep their gains. Policy efforts should prioritize building specialized financial investigation capacity, improving coordination between investigative bodies, prosecutors, and financial intelligence units, and enhancing tools for tracing and freezing assets domestically and across borders. Establishing clear procedures for managing and redistributing recovered assets can further reinforce public trust and demonstrate the real outcomes of anti-corruption efforts.
- 5. Establish a Credible and Complete Whistleblower Protection System.** A whistleblower framework should provide secure reporting channels, legal protection against retaliation, clear disclosure procedures, and access to remedies such as reinstatement or compensation. Protection mechanisms must be carefully designed in compliance with best practices worldwide and offered to contractors and private-sector individuals interacting with the state.
- 6. Enhance Institutional Coordination and Data Integration.** Improving information-sharing protocols among anti-corruption bodies, law enforcement agencies, financial institutions, and regulatory authorities will enhance coordination to prevent and address corruption. Developing systems to share data and common warning signs can help those responsible spot corruption risks earlier and avoid overlapping efforts between different groups.
- 7. Increase Transparency and Accountability.** Transparency must go beyond formal promises and include clear communication about the results. Regular data collection on investigations, prosecutions, asset recovery, and institutional performance, alongside transparent reporting, helps strengthen credibility and encourages public participation in monitoring governance.

- 8. Invest in Long-Term Institutional Capacity and Continuity.** Sustainable anti-corruption reform requires stable institutions that can develop expertise over time. Frequent changes in structure or leadership can weaken the knowledge and effectiveness of these institutions. Policy efforts should focus on strengthening the skills of anti-corruption bodies, ensuring steady leadership and direction, and providing ongoing training in areas like financial investigations, compliance systems, and risk analysis. Developing these capacities over the long term is crucial for moving from reacting to corruption to actively preventing it.

References

- “2023 yil uchun korrupsiyaga oid jinoyatlar statistikasi ochiqlandi.” *Qalampir.uz*. December 16, 2024. <https://qalampir.uz/uz/news/2023-yil-uchun-korrupsiyaga-oid-zhinoyatlar-statistikasi-ochiklandi-111377>
- “2025-yilda 5222 ta korrupsion jinoyat sodir etildi.” *Gazeta.uz*. February 8, 2026. <https://www.gazeta.uz/oz/2026/02/08/korrupsiya/>
- “2025 Corruption Perceptions Index - Explore Uzbekistan’s Results.” *transparency.org* February 10, 2026. <https://www.transparency.org/en/cpi/2025>
- “250 dan ortiq hokim yordamchilari korrupsiya uchun javobgarlikka tortildi.” *Kun.uz*. March 13, 2026. <https://kun.uz/79450719>
- Campos, J. Edgardo, and Vinay Bhargava. “Introduction: Tackling a Social Pandemic.” In *The Many Faces of Corruption: Tracking Vulnerabilities at the Sector Level*, edited by J. Edgardo Campos and Sanjay Pradhan, 3–4. Washington, DC: World Bank, 2007.
- “Corruption Perceptions Index 2025.” *Transparency.Org*. February 10, 2026. <https://www.transparency.org/en/cpi/2025>
- Gorta, Angela. “Research: A Tool for Building Corruption Resistance.” In *Corruption and Anti-Corruption*, edited by Peter Larmour and Nick Wolanin. (Canberra: ANU Press, 2001).
- Kaufmann, Daniel, Aart Kraay, and Massimo Mastruzzi. “Governance Matters VIII: Aggregate and Individual Governance Indicators, 1996–2008.” World Bank Policy Research Working Paper No. 4978. Washington, DC: World Bank, 2009.
- Kaufmann, Daniel, and Aart Kraay. “Governance Indicators: Where Are We, Where Should We Be Going?” *World Bank Research Observer* 23, no. 1 (2008): 1–30.
- “Korrupsiya tufayli davlat va jamiyat manfaatlariga 1 trillion 282 milliard soʻm zarar yetkazildi.” *Yuz.uz*. 10 mart 2022. <https://yuz.uz/uz/news/korrupsiya-tufayli-davlat-va-jamiyat-manfaatlariga-1-trillion-282-milliard-som-zarar-etkazildi>

OECD. *Anti-Corruption Toolkit for Development Practitioners*. Paris: OECD Publishing, 2006.

OECD. *Committing to Effective Whistleblower Protection*. (Paris: OECD Publishing, 2016).

OECD. *G20 Compendium of Best Practices and Guiding Principles for Legislation on the Protection of Whistleblowers*. (Paris: OECD Publishing, 2019).

Organisation for Economic Co-operation and Development (OECD). *DAC Network on Governance: Synthesis of Lessons Learned of Donor Practices in Fighting Corruption*. DCD/DAC/GOVNET (2003)1. (Paris: OECD, 2003).

“O‘zbekiston korrupsiyaga qarshi kurash reytingida pastladi.” *Kun.uz*. February 11, 2026. <https://kun.uz/37187545>

O‘zbekiston Respublikasi Korrupsiyaga qarshi kurashish agentligi. “O‘zbekiston Respublikasida korrupsiyaga qarshi kurashish to‘g‘risida milliy ma‘ruza.” <https://anticorruption.uz/uz/article/ozbekiston-respublikasida-korrupsiyaga-qarshi-kurashish-togrisida-milliy-maruza>

O‘zbekiston Respublikasi Oliy Majlisi Senati. “O‘zbekiston Respublikasi Prezidenti Sh.M. Mirziyoyev tomonidan Korrupsiyaga qarshi kurashish milliy kengashi majlisida belgilab berilgan ustuvor yo‘nalishlardan kelib chiqib, O‘zbekiston Respublikasi Oliy Majlisining Senati hamda xalq deputatlari mahalliy Kengashlari oldida turgan vazifalar to‘g‘risida.” Resolution, March 17, 2025, SQ-89-V. <https://lex.uz/docs/-7454538>

“O‘zbekistonda bir yil ichida korrupsiyadan yetkazilgan zarar 2,81 trilion so‘mga yetdi.” *Frank.uz*. <https://frank.uz/uz/yangiliklar/ozbekistonda-bir-yil-ichida-korrupsiyadan-yetkazilgan-zarar-281-trillion-somga-yetdi/>

Press Secretary UZ. Telegram post. https://t.me/Press_Secretary_Uz/6928

Svensson, Jakob, “Eight Questions about Corruption.” *Journal of Economic Perspectives* 19, no. 3 (2005), pp. 19–42.

Transparency International. *Corruption Perceptions Index 2014*. Berlin: Transparency International, 2014.

Transparency International. *Corruption Perceptions Index 2025*. February 10, 2026. <https://www.transparency.org/en/publications/corruption-perceptions-index-2025>

Transparency International. *International Principles for Whistleblower Legislation*. 2013.

United Nations Office on Drugs and Crime. *United Nations Convention against Corruption*. New York: United Nations, 2004. https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf

United Nations. *United Nations Convention against Corruption (UNCAC)*. 2003.