

The Activity of Corporate Legal Departments of Companies in Uzbekistan In Controlling the Procurement Process and The Work of Procurement Units: Incorporating Advanced Foreign Experience

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Abstract

This article examines the role of corporate legal departments in the system of internal control over the procurement process of companies in the Republic of Uzbekistan and in the oversight of the activities of procurement units. Drawing on a comparative legal analysis of current national legislation and the legislation of CIS member states and of countries in Europe, Asia, and Africa, as well as the United States; of international conventions and instruments of the UN, the EU, the OECD, the Council of Europe, the African Union, the World Bank, the IFC, the IMF, the EBRD, and the ADB; and of the ISO 37001 and ISO 20400 standards, the article develops a functional model of the legal department's involvement in procurement control and in the procurement process within the logic of the "three lines of defense." More than ten scholarly, methodological, organizational-legal, and applied problems are examined in detail, and ways of resolving them are proposed. The conclusions are supported by the case law of international and national courts and by the works of more than one hundred scholars and experts from eight regions of the world.

Keywords: Legal department, public and corporate procurement, compliance, conflict of interest, anti-corruption, due diligence, disqualification (debarment), three lines of defense, digitalization, Uzbekistan, foreign experience.

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1. Introduction

Public and corporate procurement is one of the areas of economic activity most vulnerable to abuse. According to estimates by the UNCITRAL Secretariat, procurement may account for roughly 10–20 per cent of gross domestic product and for up to 50 per cent or more of aggregate public expenditure, which determines the scale of potential losses. Professor Steven Kelman of the Harvard Kennedy School (Weatherhead Professor of

Public Management, Harvard Kennedy School; formerly Administrator of the United States Office of Federal Procurement Policy), in a classic work, showed that excessive over-regulation and a "fear of discretion" themselves diminish the quality of public procurement governance, whereas Professor Sope Williams-Elegbe of Stellenbosch University (South Africa) (Chair of the Department of Mercantile Law, Deputy Director of the African Procurement Law Unit) has substantiated the key

role of the disqualification (debarment) of unscrupulous suppliers. For the Republic of Uzbekistan, combating corruption has been elevated to a priority of State policy. President Sh. Mirziyoyev has repeatedly emphasized that corruption is "the principal obstacle on the path of

reform," undermining trust in the State and the law. It is telling that the Law "On Public Procurement" itself elevates the inadmissibility of corruption and the management of conflicts of interest to the rank of distinct legal principles and institutions (Articles 13 and 14).

Bar Chart No. 1.

**SHARE OF NON-COMPETITIVE
PUBLIC PROCUREMENT IN UZBEKISTAN**

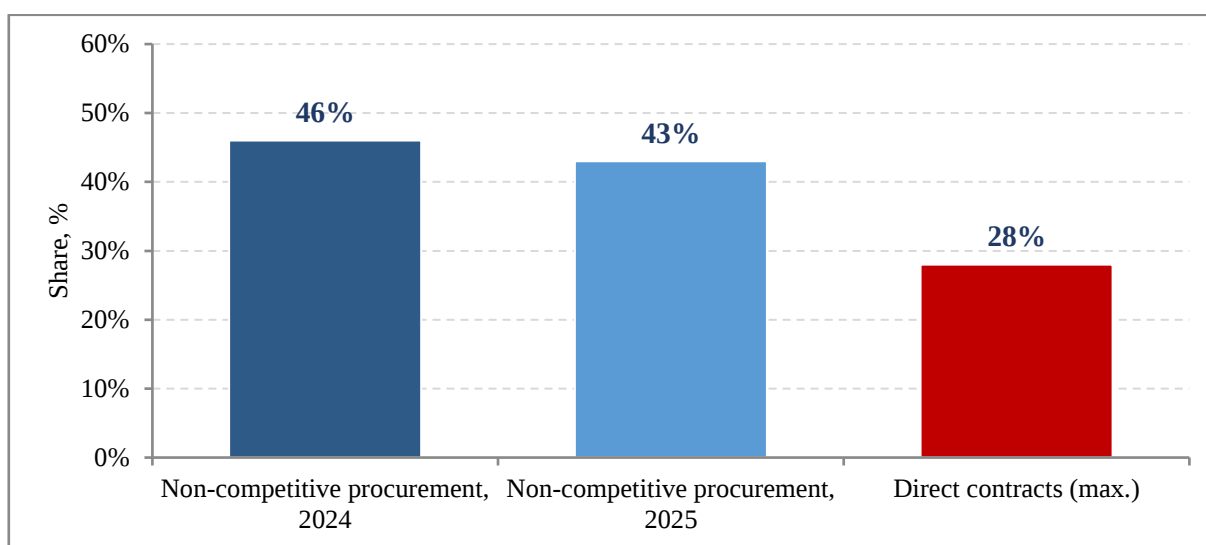
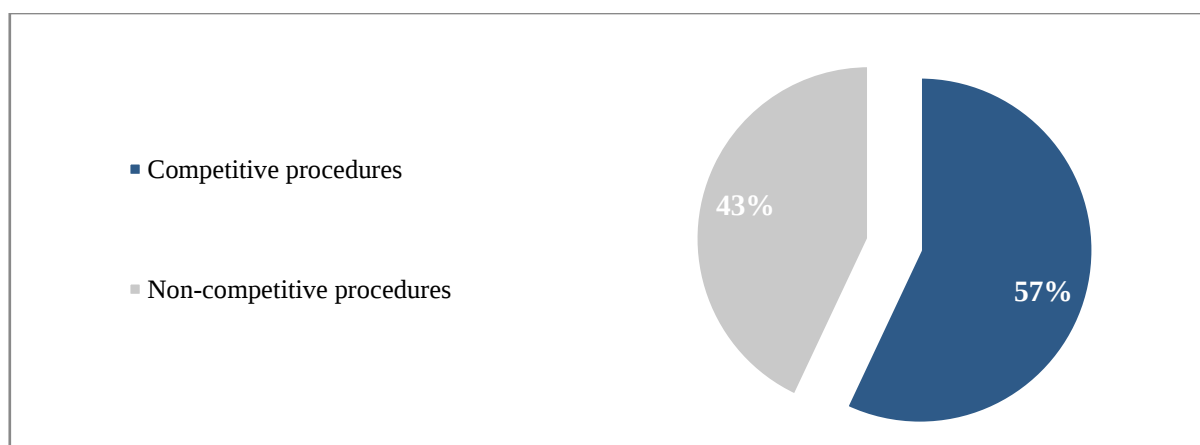


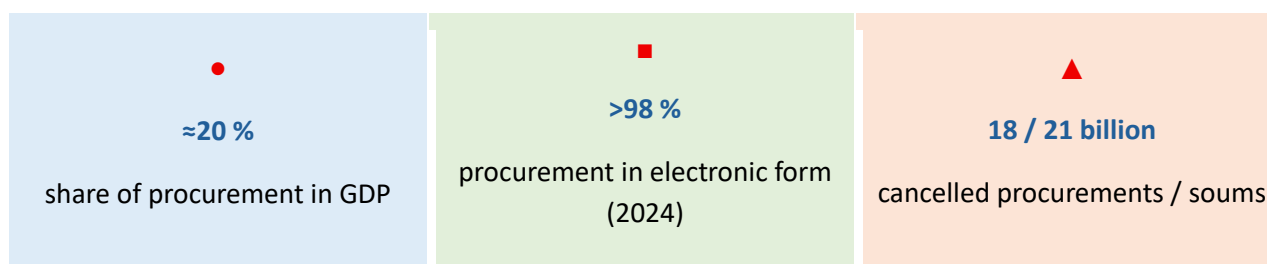
Chart No. 2.

STRUCTURE OF UZBEKISTAN'S PUBLIC PROCUREMENT (2025)



Pictogram No. 3.

KEY INDICATORS OF UZBEKISTAN'S PUBLIC PROCUREMENT



Under these conditions, a company's legal department ceases to be an exclusively "servicing" unit and becomes a key element of the internal control system – the "second line of defense." The theoretical foundation for this positioning is provided by the "desiderata" model of the public contracting system developed by S. Schooner (Steven L. Schooner, Nash & Cibinic Professor of Government Procurement Law, George Washington University; formerly Deputy Administrator of the United States Office of Federal Procurement Policy) and the principal-agent model of C. Yukins (Christopher R. Yukins, Lynn David Research Professor in Government Procurement Law, same university), according to which the divergence between the interests of the principal organization and those of the agent procurement unit gives rise to a need for independent legal control. At the same time, in domestic legal scholarships the role of the legal department specifically in controlling the procurement process has been examined only fragmentarily, and the need of large companies, including foreign-invested enterprises, for a practically applicable model remains unmet.

The aim of the study is to elucidate the functional substance of the activity of corporate legal departments in Uzbekistan in controlling the procurement process and to propose, drawing on advanced foreign experience, a normatively and methodologically grounded model of such control. Objectives: (1) to systematize the functions of the legal department; (2) to analyze the national and foreign legal framework; (3) to synthesize international standards; (4) to identify the leading case law; (5) to examine the key problems in detail; (6) to formulate recommendations. The scholarly novelty lies in constructing a functional "three lines of defense" model as applied to the procurement of Uzbek companies and in systematizing twelve problems with reference to verified foreign experience.

2. Methods

The normative basis comprised the current legislation of the Republic of Uzbekistan and of foreign countries. The comparative analysis drew on: Federal Law of the Russian Federation No. 44-FZ of 5 April 2013 "On the Contract System in the Sphere of Procurement of Goods, Works, and Services for the Provision of State and Municipal Needs" and Federal Law No. 223-FZ of 18 July 2011; the Law of the Republic of Kazakhstan No. 106-VIII ZRK of 1 July 2024 "On Public Procurement" (in force from 1 January 2025); European Union Directives 2014/23/EU, 2014/24/EU, and 2014/25/EU; the United States Federal Acquisition Regulation (FAR) and the Competition in Contracting Act of 1984; the United Kingdom Procurement Act 2023; the Australian Public Governance, Performance and Accountability Act 2013; in Africa – the Nigerian Public Procurement Act 2007 and the South African Preferential Procurement Policy Framework Act 2000.

The following methods were used: comparative-legal, formal-legal, historical-legal (the evolution from Law No. ZRU-472 of 2018 to Law No. ZRU-684 of 2021), systemic-structural, statistical, and the method of legal modelling and case-study. The works of more than one hundred scholars from Uzbekistan, Kazakhstan, Russia, Europe, the United States, Africa, and Australia were drawn upon. The academic degree, scholarly rank, position, and affiliation of the cited authors are given directly in the text upon first mention. All sources have been verified; bibliographic details that could not be established (individual page numbers, the extent of editions, particular distinctions) are marked in red and are to be confirmed against the original, since the fabrication of data in scholarly work is impermissible.

The theoretical and methodological basis of the study comprised an extensive body of doctrinal works,

systematized below by principal scholarly schools.

The foreign school of public procurement law. The conceptual framework is set by the works of S. Arrowsmith (the substantiation of the UNCITRAL Model Law as a global standard; the foundational treatise "The Law of Public and Utilities Procurement"), C. Yukins (the principal-agent model of procurement law), S. Schooner (the objectives of the contracting-law system; rethinking the suspension and debarment of suppliers), and S. Kelman (the critique of excessive over-regulation and of the "fear of discretion"). The institution of debarment and the procurement of multilateral development banks have been studied by S. Williams-Elegbe; the European procurement regime has been systematically expounded by A. Sanchez-Graells (the interplay of procurement and competition law; digital technologies), R. Caranta (the modernization of the EU directives; transparency), C. Bovis (EU public procurement law), P. Trepte (the regulation of procurement), and M. Trybus (defence procurement). The applied and comparative basis is formed by the works of N. Seddon (Australian government contracts), R. Nash, J. Cibinic and N. Castellano ("Formation of Government Contracts"), D. Gordon and J. Tillipman (contractor compliance and ethics), G. Racca (integrity and efficiency of contracts), and K. Thai (the international handbook of public procurement).

The doctrine of anti-corruption and integrity. The works drawn upon include those of S. Rose-Ackerman and B. Palifka (the institutional-economic theory of corruption, including in procurement and privatization), R. Klitgaard (the principal-agent-client model and anti-corruption bodies), M. Pieth, L. Low, and N. Bonucci (an article-by-article commentary on the OECD Anti-Bribery Convention), K. Davis (the extraterritorial regulation of transnational bribery), and T. Søreide (the causes, consequences, and cures of corruption in procurement). The systemic nature of corruption and the conditions for its control are revealed by A. Mungiu-Pippidi and M. Johnston, and its reproduction as a collective-action problem by A. Persson, B. Rothstein, and J. Teorell, as well as H. Marquette and C. Peiffer. The empirical measurement of risks is provided by the

corruption-risk index of M. Fazekas, I. Tóth, and L. King and by the model of E. Bosio, S. Djankov, E. Glaeser, and A. Shleifer, and the countering of bid rigging by the works of W. Kovacic and R. Anderson.

Corporate governance and legal function. The doctrinal support for positioning the legal department as a subject of internal control is provided by the works of J. Coffee (the theory of "gatekeepers"), B. Heineman (the "partner-guardian" model for the corporation's general counsel), and D. DeMott (the doctrine of agency and of principal-agent relations).

Post-Soviet scholarship. The works drawn upon include those of O. Belyaeva and A. Tsirin (countering corruption in corporate procurement), L. Andreeva (the legal regulation of public procurement), F. Tasalov (a comparative analysis of the contract systems of Russia and the United States), V. Kikavets (the public interest in the sphere of procurement), K. Kichik (state and municipal procurement orders), and M. Shmeleva (procurement under conditions of digitalization).

Uzbek and Central Asian scholarship. The national and regional context is reflected in the works of A. Zakirova (the institutional foundations of countering corruption in Uzbekistan), N. Salaev and B. Ismailov (organizational and legal aspects of countering corruption), and S. Aidarbayev and A. Begzhan (Kazakhstan). Taken together, this body of sources forms the doctrinal basis on which the further analysis is built.

3. Results

1. The functions of the legal department in the procurement cycle. It is appropriate to describe the legal department's procurement-control activity as an end-to-end function spanning the entire life cycle of procurement. In the Republic of Uzbekistan, the basic requirements for the legal department are set out in the Regulation on the Legal Service of State Bodies and Organizations, approved by a Resolution of the President. Although this Regulation is addressed primarily to the public sector, it serves as a methodological reference point for private companies (Table 1).

Table No. 4.

FUNCTIONS OF THE LEGAL DEPARTMENT**BY STAGE OF THE PROCUREMENT CYCLE**

Stage of the procurement cycle	Control function of the legal department	Foreign analogue / standard
Planning, identification of need	Verification of the justification and of the schedule plan; detection of indicators of procurement "splitting"	OECD Recommendation on Public Procurement (2015)
Preparation of documentation	Legal review of the procurement documentation, the criteria, and the draft contract	UNCITRAL Model Law, Arts. 4, 10–11
Qualification of participants	Vetting of counterparties and beneficial owners; control of affiliation	EU Dir. 2014/24, Art. 57; FAR 52.209
Procedures and evaluation	Monitoring compliance with the principles and the prevention of collusion and conflicts of interest	OECD Fighting Bid Rigging; EU Dir., Art. 24
Award determination, contract	Contract approval, anti-corruption clause, grounds for exclusion	ISO 37001; FAR 52.203-13
Performance and control	Contract monitoring, claims and litigation work, recording of violations	World Bank Anti-Corruption Guidelines

2. The national legislation of Uzbekistan. The cornerstone instrument is the Law "On Public Procurement" (new version; 85 articles), which entered into force on 24 July 2021 and replaced Law No. ZRU-472 of 9 April 2018. The Law introduced the concepts of the beneficial owner and of the affiliated person of a participant and the mandatory electronic form, while Law No. ZRU-1005 of 27 November 2024 introduced the principle of sustainability, centralized procurement, and framework agreements. The anti-corruption framework is formed by Law No. ZRU-419 of 3 January 2017 "On Combating Corruption" and the Law ZRU-931 of 5 June 2024 "On Conflicts of Interest".

The institutional foundations of countering corruption in Uzbekistan have been systematically analyzed by Professor A. Zakirova of the Academy of the Ministry of Internal Affairs (Doctor of Juridical Sciences, Department of Crime Prevention), and, in the light of OECD experience, by N. Salaev, Vice-Rector of Tashkent State University of Law (Doctor of Juridical Sciences, Acting Professor) and B. Ismailov (TSUL; Institute of Legislation and Legal Policy under the President of the Republic of Uzbekistan). An empirical analysis of the practice of 2024–2026 reveals three persistent types of violations: the splitting of procurements, cartel collusion, and fictitious acceptance.

Table No. 5.

EVOLUTION OF THE LEGISLATION OF THE REPUBLIC OF UZBEKISTAN

ON PUBLIC PROCUREMENT

Normative act	Year	Key changes
Law No. ZRU-472 "On Public Procurement"	2018	First systematic codification; introduction of electronic procedures
Law No. ZRU-684 (new version)	2021	Article 13 on the inadmissibility of corruption; strengthening of the principles of competition and transparency
Amendments by Law No. ZRU-1005	2024	Further refinement of procurement procedures
Law No. ZRU-1038	2025	Expansion of the powers of the Anti-Corruption Agency to monitor procurement

3. International standards and foreign experience.

Uzbekistan has been included by the UNCITRAL Secretariat among the 26 States whose procurement legislation has been shaped by the influence of the 2011 UNCITRAL Model Law. A conceptual influence on its drafting was exerted by the research of S. Arrowsmith (Sue Arrowsmith, KC (hon), Emeritus Professor of Public Procurement Law at the University of Nottingham, founder of the Public Procurement Law Review), who substantiated the Model Law as a global standard. The United Nations Convention against Corruption (New York, 31 October 2003; in force from 14 December 2005), in Article 9, requires transparent, competitive, and objective procurement systems.

At the supranational level, the WTO Agreement on Government Procurement (GPA, in force from 1 January 1996; revised text of 2012) and the EU directives are in operation, Articles 24 and 57 of which address conflicts of interest and grounds for exclusion. The system of anti-corruption conventions is complemented by the OECD Convention on Combating Bribery of Foreign Public Officials (1997) and the Council of Europe Criminal Law Convention on Corruption (ETS No. 173, Strasbourg, 27 January 1999), the monitoring of which is carried out by

GRECO. The European procurement regime has been systematically expounded in the works of A. Sanchez-Graells, Professor at the University of Bristol (Albert Sanchez-Graells, Professor of Economic Law, Co-Director of the Centre for Global Law and Innovation), R. Caranta, Professor at the University of Turin (Roberto Caranta, Professor of Administrative Law), C. Bovis, Professor at the University of Hull (Christopher H. Bovis, Professor of European Business Law, H.K. Bevan Chair), and the expert barrister P. Trepte (Peter Trepte), a member of the WTO panel in the procurement case .

According to the OECD (2026), 93 per cent of OECD member and partner countries (37 of 40) have some measure or other to promote supplier integrity, while half (20 of 40) impose requirements as to supply-chain transparency and due diligence; common measures include, in particular, "no corruption" clauses and integrity certification, including under ISO 37001. Regional instruments include the African Union Convention on Preventing and Combating Corruption (Maputo, 11 July 2003; in force from 5 August 2006), which expressly covers the private sector, and the ECOWAS Protocol on the Fight against Corruption (2001).

Bar Chart No. 6.

THE ECONOMIC WEIGHT OF PUBLIC PROCUREMENT

BY COUNTRY GROUP (% OF GDP)

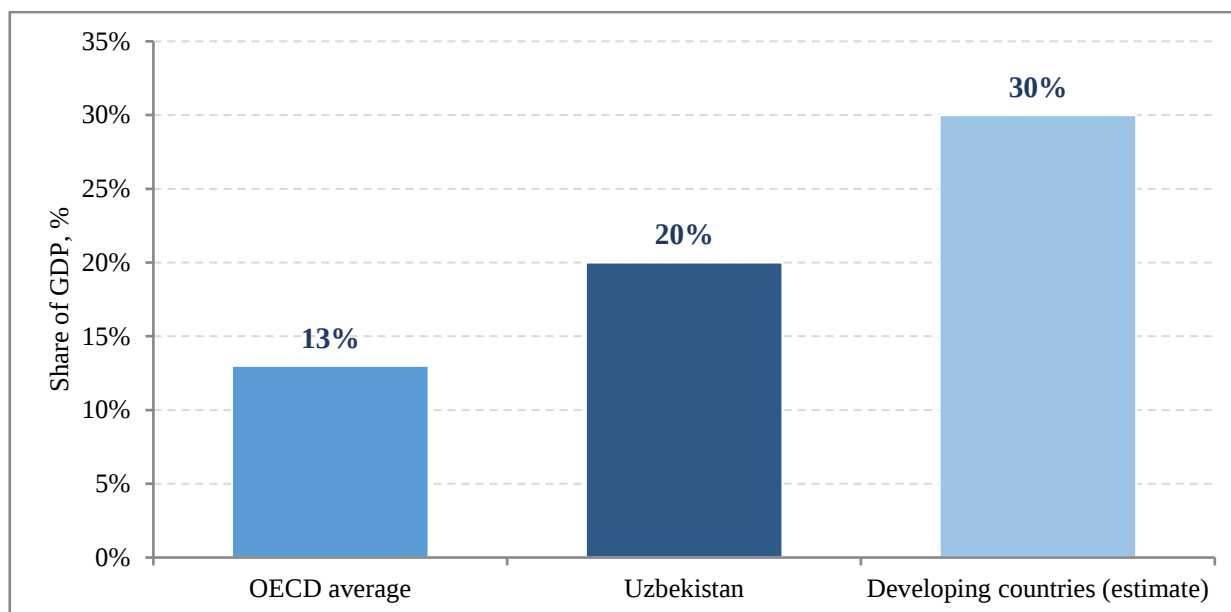
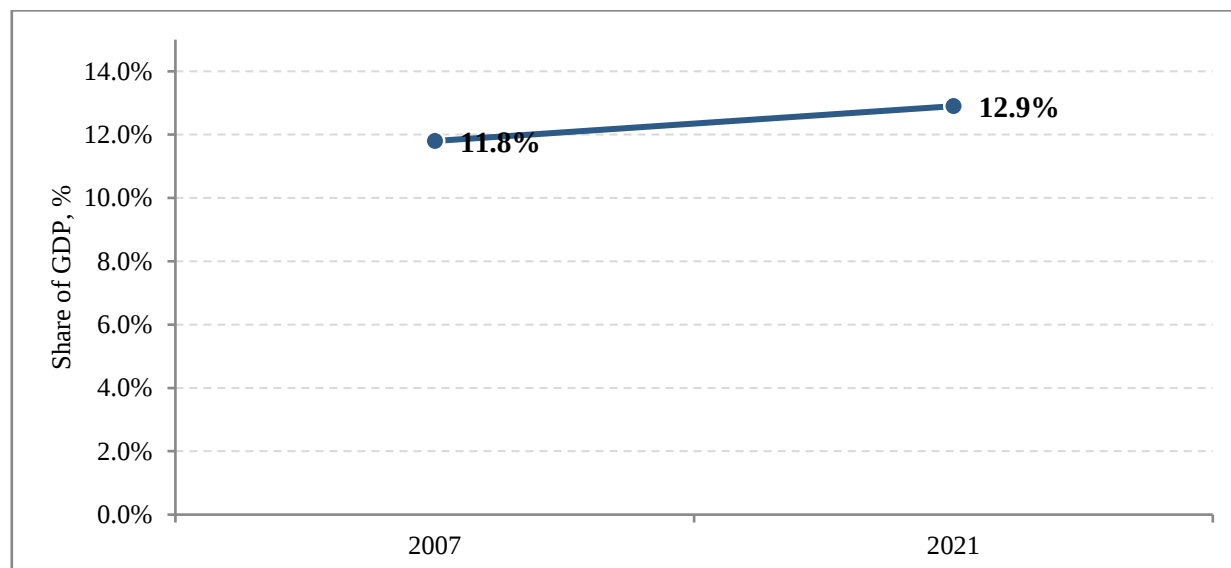


Chart No. 7.

TREND IN THE SHARE OF PUBLIC PROCUREMENT IN THE GDP OF OECD COUNTRIES



International financial institutions set practical frameworks for control. The World Bank Procurement Framework (IBRD/IDA, 2016) and its Guidelines on Preventing and Combating Fraud and Corruption provide for a system of sanctions (exclusion, debarment); the International Finance Corporation (IFC) applies its own

sanctions process, while the Agreement for Mutual Enforcement of Decisions on debarment (cross-debarment, 2010) extends sanctions to participants in the projects of five development banks – the World Bank Group, the ADB, the EBRD, and the African and Inter-American Development Banks. The International

Monetary Fund (IMF), in its Fiscal Transparency Code, has established the publication of contracts as an international norm, and an applied expression of this trend is the Open Contracting Data Standard (OCDS).

The experience of common-law countries is summarized in the foundational work "Formation of Government Contracts" by Professors R. Nash (Ralph C. Nash Jr., Professor Emeritus), J. Cibinic (John Cibinic Jr.), C. Yukins, and N. Castellano of George Washington University, while the questions of compliance and anti-corruption in contracting are addressed in the works of W. Kovacic, Professor at the same university (William E. Kovacic, former Chairman of the United States Federal Trade Commission), and J. Tillipman (Jessica Tillipman, GW Law School). Doctrinal support is also provided by the work of the Australian jurist N. Seddon (Nicholas Seddon, PhD, consultant at Ashurst Australia, formerly Professor at the Australian National University).

In post-Soviet scholarship, questions of the legal and financial regulation of procurement, including corporate procurement, have been fundamentally developed by Russian scholars: O. Belyaeva (Doctor of Juridical Sciences, Professor of the Russian Academy of Sciences, Chief Researcher at the IZiSP), L. Andreeva (Doctor of Juridical Sciences, Professor at the Kutafin Moscow State Law University (MSAL)), F. Tasalov (Doctor of Juridical Sciences, Director of the Institute of State and Regulated Procurement at MSAL), V. Kikavets (Candidate of Juridical Sciences, Associate Professor, Professor of the Department of Financial Law at the RSUJ), and M. Shmeleva (Candidate of Juridical Sciences, Associate Professor at the SSLA), and, in the Central Asian context, by S. Aidarbayev and A. Begzhan (KazNU).

Foreign scholarship on public procurement and on countering corruption in procurement that is relevant to corporate control is also represented by the works of T. Søreide (Tina Søreide, Professor at the Norwegian School of Economics, NHH), who has summarized the causes, consequences, and cures of corruption in procurement, and K. Thai (Khi V. Thai, Professor at the School of Public Administration of the University of Florida, founder of the Public Procurement Research Center), under whose editorship the international handbook of public procurement was published. The

institutional nature of corruption in procurement and privatization has been revealed by S. Rose-Ackerman (Susan Rose-Ackerman, distinguished professor of law and political science at Yale University) and B. Palifka (Bonnie J. Palifka, Tecnológico de Monterrey), and the classic principal-agent model of countering corruption and the role of anti-corruption bodies by R. Klitgaard (Robert Klitgaard, Dean and Professor at the RAND Graduate School).

The systemic nature of corruption and the conditions for its control have been studied by A. Mungiu-Pippidi (Alina Mungiu-Pippidi, Professor at the Hertie School of Governance, Berlin) and M. Johnston (Michael Johnston); A. Persson, B. Rothstein, and J. Teorell (Anna Persson, Bo Rothstein, Jan Teorell, University of Gothenburg) showed that corruption is reproduced as a collective-action problem, and H. Marquette and C. Peiffer (Heather Marquette, Caryn Peiffer) developed this approach. These works explain why purely formal control mechanisms, including corporate ones, are ineffective without durable incentives, and why the legal department must be embedded in the integrity system rather than duplicate formal procedures.

The role of the legal function and of "gatekeepers" in corporate governance has been revealed by J. Coffee (John C. Coffee Jr., Adolf A. Berle Professor of Law, Columbia University); the "partner-guardian" model for the corporation's general counsel has been substantiated by B. Heineman (Benjamin W. Heineman Jr., former General Counsel of the General Electric Corporation, Senior Fellow at Harvard University); the doctrine of representation (agency relations) has been systematized by D. DeMott (Deborah A. DeMott, Professor of Law at Duke University, Reporter for the Restatement (Third) of Agency). The extraterritorial anti-corruption regulation that is significant for foreign-invested companies has been analyzed by K. Davis (Kevin E. Davis, Professor of Business Law at New York University) and M. Pieth and co-authors (Mark Pieth, Professor of Criminal Law at the University of Basel, long-time Chair of the OECD Working Group on Bribery; L. A. Low; N. Bonucci; in the 1st edition – P. J. Cullen), who prepared the article-by-article commentary on the OECD Convention on Combating Bribery of Foreign Public Officials.

Table No. 8.

**COMPARATIVE MATRIX OF THE REGULATION OF CONFLICTS
OF INTEREST AND OF PARTICIPANT AFFILIATION**

Legal order / act	Conflict of interest	Affiliated participants	"Self-cleaning"
Uzbekistan (ZRU-684, Art. 14; ZRU-931)	Legal definition; measures of prevention and management	The concept of an affiliated person of a participant is established	Not expressly regulated
EU (Dir. 2014/24)	Art. 24 – duty to identify and eliminate	Prohibition of automatic exclusion (CJEU case law)	Art. 57(6) – permitted
United States (FAR)	OCI – organizational conflict of interest	Rules on related parties; disclosure	Compliance programs (52.203-13)
UNCITRAL (Model Law)	Principles of integrity and objectivity	Qualification criteria (Art. 9)	Through review (challenge) procedures

4. Leading case law. The control of conflicts of interest has been developed in the case law of the Court of Justice of the EU: *Fabricom* (C-21/03 and C-34/03, 2005) – the inadmissibility of the automatic exclusion of a participant who carried out preparatory work; *Assitur* (C-538/07, 2009) – concerning related undertakings; *Intrasoft* (T-403/12) – the requirement to prove an actual advantage; *Landkreis Aichach-Friedberg* (C-416/21, 2022) – the broadening of the grounds for exclusion; *Telaustria* (C-324/98, 2000) – the principle of transparency; *presstext* (C-454/06, 2008) – the limits on the modification of contracts. The only dispute under the

WTO Agreement on Government Procurement – Korea – Measures Affecting Government Procurement (WT/DS163, 2000). In common-law countries, significant cases include *Hughes Aircraft v Airservices Australia* (the "process contract"), *Renard Constructions* (good faith) and *JS McMillan v Commonwealth*.

5. Key problems of procurement control by the legal department: a detailed analysis. The systematization of national regulation and foreign experience makes it possible to identify twelve interrelated problems (Table No. 9), which are examined below by group.

Table No. 9.

**KEY PROBLEMS IN THE CONTROL OF PROCUREMENT
BY THE LEGAL DEPARTMENT AND DIRECTIONS FOR THEIR RESOLUTION**

№	Type	Substance of the problem	Direction of solution
1	scholarly	Fragmentary doctrine: the legal department is not conceptualized as a subject of procurement control	The "second line of defense" concept; the principal-agent model (Yukins)

№	Type	Substance of the problem	Direction of solution
2	methodological	Absence of metrics and of a methodology for assessing the effectiveness of control	A system of KPIs and indicators (OECD)
3	organizational-legal	Blurred delineation of the functions of the departments and of audit	Formalization of the "three lines of defense" model
4	organizational-legal	Regulation No. PP-2733 is oriented toward the public sector	A model corporate regulation
5	legal	Absence of a "self-cleaning" institution	Reception of Art. 57 of Dir. 2014/24/EU
6	legal	Weak regulation of beneficial-owner vetting at the corporate level	Development of Art. 14 of ZRU-684; due diligence
7	applied	Splitting, collusion, fictitious acceptance; weakness of "red flags"	Risk indicators; the antimonopoly authority
8	applied	Low adoption of ISO 37001/20400 and of contractual clauses	Certification; model clauses
9	legal	Underestimation of extraterritorial risks (FCPA, UK Bribery Act)	A compliance map of jurisdictions; training
10	organizational-legal	A deficit in staff qualifications	Training programs; methodology
11	applied	Weak digitalization and open data (OCDS)	Electronic procurement; risk analytics
12	legal	Lack of alignment with the disclosure trend (transparency, PIEs)	Harmonization with the IMF/OECD; disclosure

Scholarly problems (1–2). The first problem is doctrinal in nature: in domestic scholarship the legal department is not conceptualized as an independent subject of procurement control. Foreign theory offers a ready-made toolkit – the principal-agent model of C. Yukins and the "desiderata" of S. Schooner make it possible to describe the legal department as a mechanism for reducing the principal's agency costs.

The second problem is methodology: there is no methodology for assessing the effectiveness of legal control. The OECD Council Recommendation on Public

Procurement (2015) and the OECD materials on integrity provide the basis for a system of measurable indicators (the share of contracts that have undergone legal review; the number of conflicts of interest identified; the share of suppliers vetted for beneficial owners), which it is advisable to enshrine in internal regulations.

Organizational-legal problems (3, 4, 10). The third problem is the blurred delineation of the functions of the procurement department, the legal department, compliance, and internal audit; it is resolved by formalizing the "three lines of defense" model.

The fourth problem is that Regulation No. PP-2733 is oriented toward the public sector, whereas private and foreign companies need a model corporate regulation on the legal department that establishes its powers in procurement.

The tenth problem is a deficit in the qualifications of procurement personnel; the response is regular training programs and methodological support from the legal department, the significance of which is pointed out by S. Kelman's research on the quality of managerial discretion.

Legal problems (5, 6, 9, 12). The fifth problem is the absence in national law of a "self-cleaning" institution; its reception on the model of Article 57(6) of Directive 2014/24/EU would allow a bona fide supplier that has taken corrective measures to avoid exclusion.

The sixth problem is the insufficient regulation of the vetting of beneficial owners and of conflicts of interest at the corporate level; Article 14 of Law No. ZRU-684 provides a normative foundation that should be developed through local due-diligence procedures. The ninth problem is the underestimation of the extraterritorial reach of the United States Foreign Corrupt Practices Act (FCPA) and the United Kingdom

Bribery Act in cross-border procurement; a "compliance map" of jurisdictions is required.

The twelfth problem is the lack of alignment of national practice with the international disclosure trend (the IMF Code, the OCDS standard, the regime of public-interest entities), which increases reputational risks.

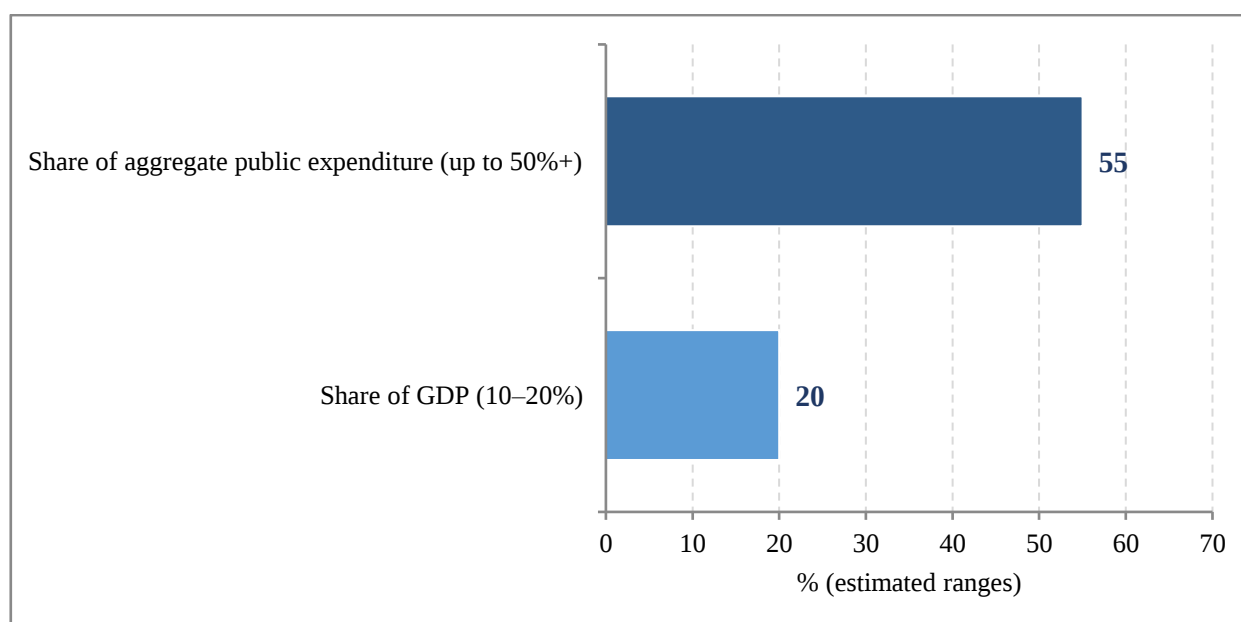
Applied problems (7, 8, 11). The seventh problem is the persistent types of violations (splitting, collusion, fictitious acceptance) and the weakness of preventive indicators; their detection is served by "red flags" and by cooperation with the antimonopoly authority in the spirit of the OECD Recommendation on Fighting Bid Rigging and of EU case law (the Landkreis Aichach-Friedberg).

The eighth problem is the low level of adoption of anti-corruption management systems (ISO 37001) and of sustainable-procurement systems (ISO 20400), as well as of anti-corruption clauses; the solution lies in certification and model contractual clauses.

The eleventh problem is the weak integration of digital tools and open data; as M. Shmeleva shows, the digitalization of procurement and risk analytics substantially enhance the effectiveness of control.

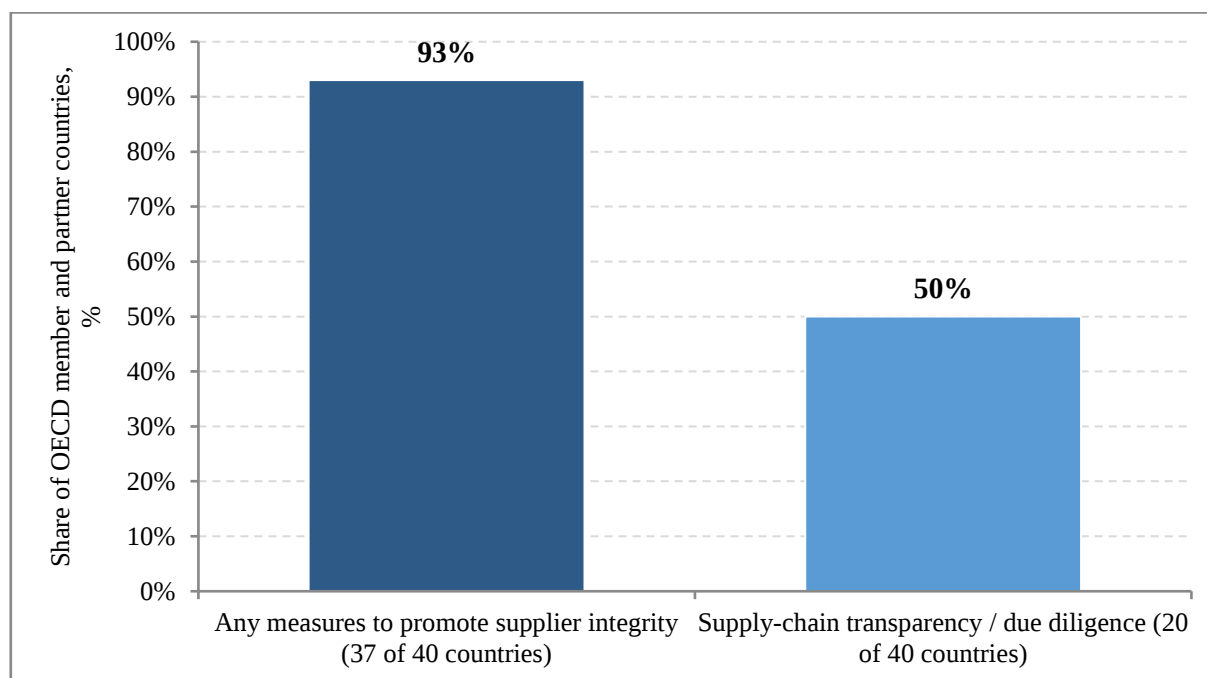
Bar Chart No. 10.

THE ECONOMIC WEIGHT OF PUBLIC PROCUREMENT



Bar Chart No. 11.

THE APPLICATION OF INTEGRITY MEASURES IN PROCUREMENT (OECD, 2026)



According to the OECD (Anti-Corruption and Integrity Outlook 2026, the chapter "Integrity in public procurement"), measures to promote supplier integrity are in place in 93 per cent of OECD member and partner

countries (37 of 40), while requirements as to supply-chain transparency and due diligence exist in 50 per cent (20 of 40).

Table No. 12.

THE "THREE LINES OF DEFENSE" MODEL IN PROCUREMENT CONTROL

Line	Actor	Functions in procurement control
<i>1st line</i>	Procurement department (process owner)	Planning, conduct of procedures, first-level control
<i>2nd line</i>	Legal department, compliance, risk management	Legal review, vetting of counterparties and beneficial owners, control of conflicts of interest, anti-corruption compliance, contract and claims work
<i>3rd line</i>	Internal audit	Independent assessment of the effectiveness of the control system
<i>External perimeter</i>	Ministry of Finance, Anti-Corruption Agency, Chamber of Accounts, courts, donors	External oversight and audit (including the World Bank, the EBRD, the ADB)

Demonstration of the problems under the conditions of Uzbekistan. To confirm the practical significance of the identified problems specifically under the conditions

of the Republic of Uzbekistan and as applied to large and medium-sized business, we examine each of them with reliance on national data, current legislation,

international instruments, case law, and doctrine. State and regulated procurement in Uzbekistan is estimated at approximately 20 per cent of GDP, which turns any of its defects into a systemic problem of national scale.

Problem 1 (scholarly). The rapid renewal of procurement legislation – the transition from Law No. ZRU-472 (2018) to Law No. ZRU-684 (2021) and the amendments by Law No. ZRU-1005 (2024) – has outpaced the development of domestic doctrine: the role of the legal department as a subject of procurement control remains theoretically unexamined. Meanwhile, the principal-agent model of C. Yukins and the "objectives model" of S. Schooner are directly applicable to holding companies and foreign-invested enterprises, where the divergence between the interests of the owner and those of the procurement unit is at its maximum. For large business, the absence of a doctrinal foundation hampers the construction of a rights-protecting function, whereas Article 13 of Law No. ZRU-684 on the inadmissibility of corruption presupposes the existence of precisely such a subject of control.

Problem 2 (methodological). The absence of control metrics is especially palpable in a country where almost half of all procurements were conducted without competitive procedures (46 per cent in 2024 and 43 per cent in 2025), and the share of direct contracts reached 28 per cent. The objective risk indicators of M. Fazekas and the empirical models of E. Bosio and co-authors give large and medium-sized business a measurement toolkit consistent with the Council Recommendation of the OECD on Public Procurement (2015). For medium-sized business, measurable indicators reduce the costs of proving good faith when participating in tenders.

Problem 3 (organizational-legal). The blurred delineation of the functions of the procurement and legal departments creates zones of unaccountability. The separation of the "three lines of defense" reduces corruption risks precisely in corporate procurement; for medium-sized business with limited staff, such a delineation is critical. A normative foundation is provided by Article 13 of Law No. ZRU-684, while Law No. ZRU-1038 of 25 February 2025 expanded the powers of the Anti-Corruption Agency to conduct monitoring, increasing external pressure on corporate control.

Problem 4 (organizational-legal). The Regulation on the Legal Service (Resolution No. PP-2733) is addressed to State bodies, whereas large private and foreign

companies operate without a model corporate regulation. The institutional models of legal support proposed by L. Andreeva and F. Tasalov are to be received all the more pressing because, from 1 January 2026, large business is covered by the regime of public-interest entities (PIEs), with mandatory IFRS reporting and public disclosure.

Problem 5 (legal). Uzbek law has no "self-cleaning" institution such as that established by Article 57(6) of Directive 2014/24/EU. Its absence deprives a bona fide supplier that has taken corrective measures of the opportunity to avoid exclusion, which for medium-sized business means disproportionate losses. Proportionality is ensured by the case law of the Court of Justice of the EU (the Fabricom cases, C-21/03 and C-34/03; Assitur, C-538/07), and the doctrine is developed by A. Sanchez-Graells, R. Caranta, and S. Williams-Elegbe .

Problem 6 (legal). The vetting of beneficial owners and of conflicts of interest at the corporate level is weakly regulated, although Article 14 of Law No. ZRU-684 establishes such requirements. Their practical acuteness was confirmed by the Anti-Corruption Agency, which in 2025 detected the participation of affiliated persons in breach of the Law "On Public Procurement" and secured the cancellation of 18 procurements worth 21 billion soums . EU experience (the Assitur case – related undertakings; Intrasoftware, T-403/12 – an actual advantage) substantiates the due diligence that is critically important for large groups of companies and holdings.

Problem 7 (applied). Splitting, collusion, and fictitious acceptance are the most widespread violations: the high share of non-competitive procurement (46 %/43 %) and the episodes that have been suppressed confirm their systemic character. The "red flag" indicators and cooperation with the antimonopoly authority, substantiated by W. Kovacic, R. Anderson, and M. Fazekas , correspond to Article 13 of Law No. ZRU-684, to the OECD Recommendation on Fighting Bid Rigging, and to EU case law (the Landkreis Aichach-Friedberg case, C-416/21); for large business this reduces the risk of cartel capture of tenders, and for medium-sized business, the barriers of unfair competition.

Problem 8 (applied). The adoption of the ISO 37001 and ISO 20400 standards and of anti-corruption clauses remains fragmentary. For foreign-invested companies, certification is critical, since it reduces extraterritorial risks and strengthens the trust of counterparties. Compliance programs and debarment are substantiated

by J. Tillipman and S. Schooner; the normative reference points are the contractor code of business ethics (FAR 52.203-13) and Article 14 of Law No. ZRU-931 "On Conflicts of Interest".

Problem 9 (legal). Large exporters and foreign-invested companies fall within the extraterritorial reach of the United States Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act, while participants in the projects of the World Bank, the IFC, the EBRD, and the ADB fall within the mutual enforcement of sanctions (cross-debarment). The need for a "compliance map" of jurisdictions, substantiated by S. Williams-Elegbe and J. Tillipman, is reinforced by the Council of Europe Convention (ETS No. 173) and by Article 9 of the United Nations Convention against Corruption (ratified by Law No. ZRU-158); for large business, the price of non-compliance is exclusion from international projects.

Problem 10 (organizational-legal). The deficit in the qualifications of procurement personnel is especially palpable in medium-sized business. The quality of procurement is directly linked to competent discretion, and the foundational works of S. Kelman and of R. Nash and co-authors serve as the methodological basis for training. Institutional support is provided by Resolution No. PP-5168 and by the expanded powers of the Anti-Corruption Agency in respect of compliance control and training.

Problem 11 (applied). The country has achieved notable progress: from 1 January 2022, fully electronic procurement was introduced through the xarid.uz portal, and by 2024 more than 98 per cent of procurements were conducted in electronic form. However, risk analytics and open data (OCDS) have been adopted insufficiently. Digital control tools allow large businesses to automate the detection of "red flags," while the IMF Fiscal Transparency Code sets a standard for data disclosure.

Problem 12 (legal). The disclosure trend has acquired a normative form: from 1 January 2026, the Ministry of Economy and Finance maintains a register of public-interest entities (PIEs) obliged to keep accounts under IFRS and to publish audited financial statements. This regime covers the largest private and State companies, including foreign-invested enterprises. The doctrine of transparency (S. Arrowsmith, R. Caranta) is consistent with Article 9 of the United Nations Convention against Corruption, with the IMF Code, and with the case law of the Court of Justice of the EU (the Telaustria case, C-324/98), which enhances the preventive value of the legal

control of disclosure.

Thus, all twelve problems are not speculative: they are confirmed by national statistics, by the practice of the Anti-Corruption Agency of the Republic of Uzbekistan, by current legislation, by international instruments, and by case law, and they are of direct significance for large and medium-sized business in the republic.

4. Discussion

A juxtaposition of national regulation with international standards makes it possible to position the legal department as the "second line of defense": the procurement unit, the process owner, constitutes the first line; the legal department, compliance, and risk management the second; and internal audit the third. This architecture resolves problems 1 and 3 by operationalizing the principal-agent model of C. Yukins and the "desiderata" of S. Schooner: the separation of powers is a necessary condition for control not to degenerate into a formality. The experience of foreign legal orders (Russia's 44-FZ, Kazakhstan's No. 106-VIII, the EU directives, the United States FAR, the United Kingdom Procurement Act 2023) shows that the effectiveness of control depends directly on the institutional independence of the controlling function.

Applied problems 7–8 and 11 are resolved by transferring the international toolkit into corporate practice. Splitting is countered by control of the schedule plan and the aggregation of needs; collusion by "red flag" indicators and cooperation with the antimonopoly authority, whose effectiveness is confirmed by EU practice and the works of W. Kovacic; fictitious acceptance by independent acceptance and contract monitoring. Digitalization and open data (OCDS), as M. Shmeleva shows, multiply the analytical capacities of the legal department many times over. Legal problems 5–6 and 9 require legislative solutions: the reception of "self-cleaning," the development of beneficial-owner vetting procedures on the basis of Article 14 of Law No. ZRU-684, and account being taken of the extraterritorial reach of the FCPA and the Bribery Act. Debarment and the mutual enforcement of the sanctions of the development banks (cross-debarment), studied by S. Williams-Elegbe, create an additional deterrent perimeter for companies participating in the projects of the IBRD, the IFC, the EBRD, and the ADB; at the same time, the case law of the Court of Justice of the EU in the Fabricom and Assitur cases sets mandatory procedural guarantees of proportionality.

For foreign-invested companies, the adoption of ISO 37001 and ISO 20400, anti-corruption clauses, and a "compliance map" of jurisdictions are strategically significant (problems 8–9). The solution to methodological and organizational problems 2, 4, and 10 lies in the plane of developing control metrics, a model corporate regulation on the legal department, and training programs. Finally, problem 12 – harmonization with the international disclosure trend (the IMF Fiscal Transparency Code, the OCDS standard) – acquires particular acuteness in the light of the regime of public-interest entities and enhances the preventive value of legal control.

An in-depth discussion of the twelve identified problems, in juxtaposition with doctrine, current legislation, and case law, confirms their systemic character and outlines the following paths to a solution:

Problem 1 (fragmentary doctrine). Conceptualizing the legal department as an independent subject of control rests on the principal-agent model of C. Yukins (Lynn David Research Professor in Government Procurement Law, George Washington University), who read procurement law through the prism of "principal-agent" relations, and on the "objectives" (desiderata) model of S. Schooner (Nash & Cibinic Professor, same university). S. Kelman (Weatherhead Professor of Public Management, Harvard Kennedy School) warns that the "fear of discretion" diminishes the quality of the management of procurement. The normative foundation is the Regulation on the Legal Service (Resolution of the President of 19 January 2017 No. PP-2733).

Problem 2 (absence of metrics). The methodology of measurement is set by objective risk indicators: M. Fazekas (Government Transparency Institute; Central European University), I. Tóth, and L. King constructed a corruption-risk index from procurement data, and E. Bosio, S. Djankov, E. Glaeser, and A. Shleifer (Harvard University) empirically linked the quality of procurement law and practice. The reference point is the OECD Council Recommendation on Public Procurement (2015), and the structure of stakeholder expectations was revealed by S. Schooner, D. Gordon, and J. Clark.

Problem 3 (delineation of functions). The "three lines of defense" model delineates the procurement unit, the legal department and compliance, and internal audit. O. Belyaeva (Doctor of Juridical Sciences, Professor of the Russian Academy of Sciences, IZiSP) and A. Tsirin substantiated directions for enhancing the effectiveness

of countering corruption in corporate procurement. Normatively, the separation of powers is supported by the principle of the inadmissibility of corruption (Art. 13 of Law No. ZRU-684).

Problem 4 (a gap for the private sector). Regulation No. PP-2733 is addressed to the public sector; for foreign-invested companies, a model corporate regulation on the legal department is required. L. Andreeva (Doctor of Juridical Sciences, Professor at the Kutafin MSAL) emphasizes the creation of competitive conditions for procurement, while the comparative Russian-American study of F. Tasalov (Doctor of Juridical Sciences, Director of the Institute of Public Procurement at MSAL) demonstrates institutional models of legal support.

Problem 5 (absence of "self-cleaning"). The self-cleaning institution is established by Article 57(6) of Directive 2014/24/EU; its proportionate application rests on the case law of the Court of Justice of the EU – the Fabricom cases (C-21/03 and C-34/03, 2005) and Assitur (C-538/07, 2009), which prohibited automatic exclusion without the right to prove the absence of a distortion of competition. A. Sanchez-Graells (Professor of Economic Law, University of Bristol) and R. Caranta (Professor of Administrative Law, University of Turin) analyze this institution, and S. Williams-Elegbe (Professor, Stellenbosch University) substantiates the conditions for the effectiveness of debarment.

Problem 6 (beneficial-owner vetting). Article 14 of Law No. ZRU-684 and Article 24 of Directive 2014/24/EU require the identification and management of conflicts of interest. The Court of Justice of the EU, in the Assitur case, did not permit the automatic exclusion of related undertakings, and in the Intrisoft International case (T-403/12) required proof of an actual advantage. Due diligence in respect of beneficial owners is substantiated by the works of K. Kichik (Candidate of Juridical Sciences, Lomonosov Moscow State University) and V. Kikavets (Candidate of Juridical Sciences, RSUJ).

Problem 7 (typical violations). The countering of collusion rests on the works of W. Kovacic (Global Competition Professor, former Chairman of the United States Federal Trade Commission) and R. Anderson (WTO) on ensuring integrity and competition, as well as on the "red flag" indicators of M. Fazekas. The normative basis is formed by Article 13 of Law No. ZRU-684 and the OECD Recommendation on Fighting Bid Rigging; in

EU practice, the Landkreis Aichach-Friedberg case (C-416/21, 2022) is significant, having extended the grounds for exclusion beyond Article 101 TFEU.

Problem 8 (adoption of ISO and of clauses). The standards ISO 37001:2016 and ISO 20400:2017, the mandatory contractor code of business ethics (FAR 52.203-13), and anti-corruption clauses form the corporate perimeter. J. Tillipman (George Washington University Law School) studies compliance programs, and S. Schooner substantiates debarment as an effective instrument.

Problem 9 (extraterritorial risks). The United States Foreign Corrupt Practices Act (FCPA, 1977), the United Kingdom Bribery Act 2010, and the Council of Europe Criminal Law Convention on Corruption (ETS No. 173, 1999) operate extraterritorially. J. Tillipman and W. Kovacic show the need for a "compliance map" of jurisdictions; for participants in the projects of the development banks, the mutual enforcement of sanctions (cross-debarment), studied by S. Williams-Elegbe, is significant.

Problem 10 (staff qualifications). S. Kelman links the quality of procurement to competent discretion, and the foundational work of R. Nash and J. Cibinic (George Washington University) serves as the methodological basis for the training of procurement personnel. Institutional support is provided by the Resolution of the President of 29 June 2021 No. PP-5168 on improving legal services.

Problem 11 (digitalization). M. Shmeleva (Candidate of Juridical Sciences, SSLA) substantiates the development of procurement under conditions of digitalization, A. Sanchez-Graells analyzes digital technologies in procurement, and M. Fazekas demonstrates the potential of "big data" for the detection of risks. The normative vector is set by the IMF Fiscal Transparency Code (2019) and the Open Contracting Data Standard (OCDS).

Problem 12 (disclosure and transparency). The principle of transparency for contracts is established by the case law of the Court of Justice of the EU (the Telaustria case, C-324/98, 2000), and the limits on the modification of contracts by the presstext case (C-454/06, 2008). S. Arrowsmith (Emeritus Professor at the University of Nottingham) and R. Caranta develop the doctrine of transparency, which is consistent with Article 9 of the United Nations Convention against Corruption and with the IMF Code. For Uzbekistan, this vector is

reinforced by the policy course of President Sh. Mirziyoyev, who, in his Address to the Oliy Majlis of 26 December 2025, called corruption a serious threat to the development of the State.

Thus, all twelve problems have a doctrinal, normative, and judicial foundation, which confirms the practical applicability of the proposed "three lines of defense" model and its value for large companies in Uzbekistan.

5. Conclusion

The legal department of a company in Uzbekistan acts as the load-bearing element of the system of internal control over procurement – the "second line of defense," ensuring the lawfulness, integrity, and effectiveness of the procurement process. The current national legal framework (Laws No. ZRU-684, No. ZRU-419, No. ZRU-931, and the Regulation on the Legal Service), in combination with the legislation of the States of the CIS, Europe, the United States, Asia, and Africa and with international standards (the UNCITRAL Model Law, the United Nations Convention against Corruption, the Council of Europe Convention, the EU directives, the OECD recommendations, the instruments of the World Bank, the IFC, the IMF, the EBRD, and the ADB, and the ISO standards), provides a sufficient foundation for building a model of control and resolving the twelve identified problems.

Recommendations:

- (1) to enshrine the end-to-end participation of the legal department in the procurement cycle within the logic of the "three lines of defense" (problems 1, 3);
- (2) to adopt a model corporate regulation on the legal department (problem 4);
- (3) to develop metrics for the effectiveness of control (problem 2);
- (4) to introduce due diligence in respect of beneficial owners and control of affiliation (problem 6);
- (5) to develop compliance on the basis of ISO 37001 and sustainable procurement on the basis of ISO 20400 (problem 8);
- (6) to consider the "self-cleaning" institution (problem 5);
- (7) to build a system of "red flags" and cooperation with the antimonopoly authority (problem 7);

(8) to take into account extraterritorial risks and cross-debarment (problem 9);

(9) to implement staff training programs (problem 10);

(10) to adopt digital tools and open data (problem 11);

(11) to harmonize disclosure practice with international standards (problem 12).

The implementation of these measures enhances the resilience of companies to corruption-related and legal risks and aligns national practice with advanced foreign experience.

Expanding on the conclusions, we emphasize that the proposed model resolves all twelve problems systemically. The scholarly and methodological problems (1–2) are addressed by the doctrine of the "second line of defense" (C. Yukins, S. Schooner) and by objective risk metrics (M. Fazekas, I. Tóth, L. King; the OECD Recommendation of 2015).

The organizational-legal problems (3, 4, 10) require the formalization of the "three lines of defense," a model corporate regulation on the legal department, and training programs, drawing on Resolutions No. PP-2733 and No. PP-5168 and the works of O. Belyaeva, L. Andreeva, F. Tasalov, and S. Kelman.

The legal problems (5, 6, 9, 12) are resolved by the reception of "self-cleaning" (Art. 57(6) of Dir. 2014/24/EU; the *Fabricom* and *Assitur* cases), the development of beneficial-owner vetting (Art. 14 of Law No. ZRU-684; the *Intrasoft International* case), account being taken of the FCPA, the Bribery Act, and the Council of Europe Convention (ETS No. 173), and the harmonization of disclosure with Article 9 of the United Nations Convention against Corruption, the IMF Code, and the practice of transparency (the *Telaustria* and *presstext* cases; S. Arrowsmith, R. Caranta, A. Sanchez-Graells).

The applied problems (7, 8, 11) are overcome by "red flag" indicators and cooperation with the antimonopoly authority (W. Kovacic, R. Anderson; the *Landkreis Aichach-Friedberg* case), the adoption of ISO 37001/20400 and anti-corruption clauses (J. Tillipman, S. Schooner, S. Williams-Elegbe), and the digitalization of procurement using open data (M. Shmeleva, A. Sanchez-Graells; the IMF Code, OCDS).

The implementation of these measures, supported by verified foreign experience and by the practice of

international and national courts, ensures the transition of the legal department from a servicing to a strategic control function and aligns the practice of Uzbek companies with international integrity standards.

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