

CODE OF CONDUCT

for Personnel and Agents (PFI) of the “Expanding Opportunities and Promoting Equity in Education” Program (PforR, P513279), including employees of participating commercial banks

I. General Provisions

1. This Code of Conduct (hereinafter — the Code) has been developed pursuant to Action No. 14 of the Program Action Plan (PAP) and the recommendations of the Environmental and Social Systems Assessment (ESSA, September 2025) of the “EduImkon” Program (hereinafter — the Program), implemented by the Education Loan Financing Fund under the Ministry of Economy and Finance of the Republic of Uzbekistan (hereinafter — the Fund) with the financial support of the World Bank.
2. This Code supports the Program’s compliance with the World Bank’s Program-for-Results (PforR) Core Principles, in particular: Core Principle 1 (general environmental and social management), by embedding accountability, professional conduct and grievance-handling requirements into day-to-day Program implementation; Core Principle 3 (protection of public and worker safety), by setting clear standards of conduct and requiring safe, respectful treatment of applicants, students and staff; Core Principle 5 (attention to vulnerable and disadvantaged groups), by requiring non-discriminatory, accessible and culturally appropriate treatment of applicants from vulnerable and disadvantaged groups; and Core Principle 6 (avoidance of social conflict), by establishing a transparent grievance redress mechanism and a zero-tolerance policy toward retaliation, harassment and SEA/SH.
3. The Code establishes uniform principles and rules of professional conduct and is aimed at preventing violations, eliminating their causes and enabling conditions, ensuring fair, respectful and non-discriminatory treatment of all applicants, students and their families, and enshrining a zero-tolerance policy toward any forms of harassment, sexual exploitation, sexual harassment and violence (SEA/SH, gender-based violence).
4. Compliance with the Code is one of the criteria for assessing the professionalism of managers and employees engaged in the Program. The Code has been developed in accordance with the Constitution of the Republic of Uzbekistan (as amended in 2023), including its guarantees of equality and non-discrimination, the Labor Code of the Republic of Uzbekistan, the Law “On Appeals of Individuals and Legal Entities”, (No. ZRU-445, 2017); the Law “On Personal Data” (No. ZRU-547, 2019); the Law “On Guarantees of Equal Rights and Opportunities for Women and Men” (No. ZRU-562, 2019); the Law “On Combating Corruption” (No. ZRU-419, 2017); the Law “On Administrative Procedures” (No. ZRU-457, 2018), other legislative acts and the requirements of the World Bank. For the purposes of this Code, vulnerable and disadvantaged groups include, but are not limited to, women from low-income households, persons with disabilities, students from rural and remote areas, students from low-income families, persons facing language or digital access barriers, and other groups that may experience difficulty accessing education loans or complaint channels.
5. Each person covered by this Code shall be familiarized with it against signature (using the form set out in the Appendix to this Annex) and shall comply with its requirements. Familiarization is

carried out upon hiring (engagement in the Program) and repeated at least once a year as part of training.

II. Scope of Application

6. The Code applies to:

- the management and staff of the Fund, including employees servicing telephone lines (call center);
- members of the Project Implementation Unit (PIU): the Project Coordinator, the Financial Management Specialist, the Procurement Specialist, the Monitoring and Evaluation Specialist, the Environmental and Social / Stakeholder Engagement Specialist, and the Administrative Assistant;
- employees of the twelve participating commercial banks (Mikrokreditbank, Asaka Bank, Agrobank, Ipoteka Bank, Business Development Bank, Turon Bank, Orient Finans Bank, National Bank, Uzsanoatqurilishbank, Hamkorbank, Aloqabank, Xalq Banki), including their regional and district branches, with respect to activities related to receiving applications and issuing and servicing education loans under the Program;
- consultants, contractors, agents and other persons engaged by the Fund or the banks to perform functions under the Program (hereinafter collectively — Program personnel and agents).

7. The provisions of this Code apply in the performance of official duties, as well as in all interactions with applicants, students, their families, guarantors, and other stakeholders, whether conducted in person, by telephone, through electronic communication channels, social media, or any other means. In implementing this Code, all personnel shall ensure accessibility of services and communications, provide reasonable accommodation for persons with disabilities and other individuals with specific needs, act in a transparent and accountable manner, process personal data lawfully and confidentially in accordance with applicable legislation, and ensure that no person is subjected to retaliation, intimidation, discrimination, or any other adverse consequences for reporting concerns, submitting complaints, or participating in grievance resolution processes in good faith.

III. Core Principles of Conduct

8. Program personnel and agents shall carry out their professional activities on the basis of the following principles:

- legality;
- respect for and protection of the rights, freedoms and legitimate interests of applicants, students, their families, guarantors, and other stakeholders;
- fairness, honesty, integrity and impartiality;
- equal access, accessibility and non-discrimination, including on the grounds of gender, age, disability, ethnicity, language, religion, social origin, place of residence, property status, or any other status protected by applicable law;
- provision of reasonable accommodation to persons with disabilities and other individuals with specific needs to ensure equal access to Program services and grievance mechanisms;

- promotion of gender equality and special attention to the needs of vulnerable and disadvantaged groups, including women, persons with disabilities, students from low-income households, and students from rural and remote areas;
- prevention and proper management of conflicts of interest;
- transparency, accountability, and openness in decision-making and service delivery;
- lawful, fair, and confidential processing and protection of personal data in accordance with applicable legislation;
- non-retaliation, ensuring that no person is subjected to intimidation, discrimination, harassment, or any adverse action for reporting concerns, submitting complaints, participating in grievance processes, or cooperating with investigations in good faith.

IV. Obligations of Program Personnel and Agents

9. Program personnel and agents undertake to:

- strictly comply with the legislation of the Republic of Uzbekistan and the requirements of the World Bank and the provisions of this Code in the implementation of the Program;
- perform their duties professionally, diligently, and in a timely manner, ensuring that education loan applications are reviewed solely on the basis of established eligibility criteria and documented procedures, without bias or undue influence;
- provide applicants, students, guarantors, and their families with accurate, complete, timely, and easily understandable information regarding eligibility criteria, required documentation, application procedures, loan terms and conditions, reasons for approval or rejection, repayment obligations, complaint procedures, and available Grievance Redress Mechanism (GRM) channels;
- ensure that all applicants receive equal treatment and are not discriminated against on any prohibited grounds; provide accessible communication and reasonable accommodation, where required, to persons with disabilities and other vulnerable or disadvantaged applicants to ensure equal access to Program services;
- provide additional guidance and assistance, where appropriate, to vulnerable and disadvantaged groups, including persons with disabilities, women from low-income households, students from low-income families, and students from rural and remote areas, without granting preferential treatment inconsistent with the Program eligibility criteria;
- not request, solicit, accept, or receive any unofficial payment, gift, favor, commission, or other benefit in connection with the processing, approval, servicing, restructuring, or collection of education loans, and immediately report any attempted bribery, fraud, or corrupt practices;
- not require applicants to submit documents, make payments, or complete procedures that are not provided for under the applicable Program rules; clearly explain any additional information legitimately required and the legal basis for such requests;
- protect the confidentiality of applicants' and borrowers' personal data and ensure that personal data are collected, processed, stored, shared, and retained only for lawful Program purposes and in accordance with applicable legislation;

- treat all borrowers with dignity and respect during loan servicing and debt collection activities, refrain from harassment, intimidation, coercion, discrimination, public disclosure of debt information, or any abusive practices, and ensure that all recovery measures comply with applicable law and ethical standards;
- use Program funds, assets, information, and other resources efficiently, responsibly, and solely for authorized purposes;
- refrain from any conduct that could undermine the integrity, credibility, or reputation of the Fund, participating commercial banks, the Program, or the World Bank;
- promptly report any suspected violations of this Code, fraud, corruption, conflicts of interest, discrimination, harassment, SEA/SH, misuse of Program resources, personal data breaches, or other misconduct through established reporting or grievance mechanisms, and cooperate with any subsequent review or investigation.

V. Zero Tolerance for SEA/SH and Gender-Based Violence

10. For the purposes of this Code:

- **Sexual Exploitation and Abuse (SEA)** means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another person.
- **Sexual Harassment (SH)** means any unwelcome sexual advance, request for sexual favors, or other unwelcome verbal, non-verbal, or physical conduct of a sexual nature that may reasonably be expected or perceived to cause offence, humiliation, intimidation, or create a hostile or abusive environment.
- **Gender-Based Violence (GBV)** means harmful acts directed against a person because of their gender, gender identity, gender expression, or perceived gender, including acts that cause or are likely to cause physical, sexual, psychological, or economic harm.

The Program applies a zero-tolerance policy toward Sexual Exploitation and Abuse, Sexual Harassment (SEA/SH), Gender-Based Violence and all other forms of abuse and harassment. Program personnel and agents are strictly prohibited from:

- exchanging money, employment, services, preferential lending terms, or any other benefit for sexual services, or engaging in any exploitative, coercive, abusive, or degrading conduct;
- engaging in sexual activity with any person under the age of 18 years, regardless of the age of majority or consent under national law; a mistaken belief regarding a person's age shall not constitute a defense;
- engaging in any form of sexual harassment, abuse of authority, intimidation, coercion, discrimination, or other inappropriate conduct toward applicants, students, borrowers, guarantors, their family members, colleagues, or other stakeholders;
- using language or behavior, particularly toward women, children, or members of vulnerable groups, that is offensive, sexually suggestive, humiliating, degrading, intimidating, or culturally inappropriate, including in face-to-face communication, telephone conversations, electronic communications, and social media;

- retaliating against, intimidating, threatening, or otherwise subjecting to adverse treatment any person who, in good faith, reports suspected violations of this Code, cooperates with an investigation, or uses the Program's Grievance Redress Mechanism.

11. All reports of alleged SEA/SH incidents shall be handled in strict confidence in accordance with the sensitive-complaints protocol established under the GRM Guidelines (Annex 2, Section 7). All cases shall be managed using a survivor-centered approach that respects the survivor's safety, dignity, confidentiality, informed choice, and non-discrimination. Where appropriate and only with the informed consent of the survivor, referrals shall be made to available medical, psychosocial, legal, protection, or other support services.

VI. Responsibilities of Managers

12. The Director of the Fund, the PIU Project Coordinator and the heads of the involved units of the participating banks shall:

- set an example of professionalism, integrity and fairness;
- create working conditions that meet the requirements of occupational safety, sanitation, and social and environmental standards;
- ensure gender equality and take measures to prevent any cases of sexual violence, harassment or exploitation;
- take timely measures to prevent and resolve conflicts of interest and corruption;
- not allow the hiring of persons under 18 years of age, hiring based on kinship or personal loyalty, or the use of forced and child labor;
- ensure the functioning of GRM channels and the timely handling of complaints, including complaints from employees;
- take response measures with respect to actions (or inaction) of employees that violate the principles and rules of this Code;
- ensure that all relevant personnel complete induction and annual refresher training on the Code, GRM, SEA/SH prevention, non-discrimination and personal data protection;
- report serious Program-related incidents and systemic issues through established Program reporting channels.

VII. Conflict of Interest

13. Program personnel and agents must avoid situations in which a personal interest (a benefit for themselves, close relatives or other related persons) influences or may influence the impartial performance of their duties, including decision-making on the issuance of education loans.

14. If a conflict of interest arises, the employee shall immediately notify their direct supervisor (in the Fund — the Project Coordinator; in a bank — the head of the unit), who shall take measures to resolve it, up to and including recusing the employee from the review of the relevant application. Conflicts of interest at the level of the Fund's management shall be reported to the Ministry of Economy and Finance.

VIII. Anti-Corruption

15. Program personnel and agents are prohibited from receiving from individuals or legal entities any material benefits, gifts, remuneration or services in connection with the performance of their duties under the Program, including for expediting the review of applications, making a favorable loan decision or softening debt collection terms.

16. Employees shall immediately report all instances of inducement to corrupt actions, as well as any facts of corruption that come to their knowledge, to management and/or through GRM channels. Persons who report violations in good faith are protected from dismissal, persecution and other forms of retaliation.

IX. Confidentiality and Personal Data Protection

17. Program personnel and agents shall ensure the confidentiality, integrity and security of the personal data of applicants and students, including data on income, family composition, disability and inclusion in the Unified Register of Social Protection, in accordance with personal data protection legislation and the Program's internal regulations.

18. Personal data shall be collected and processed only with the consent of the data subject, where required by applicable law, and only to the extent necessary for the implementation of the Program. Access to personal data shall be limited to authorized personnel on a need-to-know basis through appropriate access controls. Personal data shall be securely stored and protected against unauthorized access, loss, alteration, or disclosure through appropriate organizational and technical measures, including cybersecurity safeguards.

19. Personal data shall be retained only for the period necessary to fulfill the purposes of the Program or as required by applicable law, after which it shall be securely deleted, destroyed, or anonymized, as appropriate. Program personnel and agents are prohibited from disclosing, sharing, or using confidential information for any unofficial or unauthorized purpose. Any unauthorized disclosure or misuse of confidential information shall result in liability in accordance with the applicable legislation and the Program's internal policies.

X. Liability for Violation of the Code

20. Violation of the Code may constitute grounds for disciplinary action in accordance with the procedure provided for by labor legislation (remark, reprimand, termination of the employment contract) and, where there are indications of an administrative offense or a crime, for referral of the materials to law enforcement authorities.

21. Reports of violations of the Code are considered: with respect to employees of the Fund and the PIU — by a commission established in accordance with the procedure set out in the GRM Guidelines; with respect to employees of participating banks — by the authorized units of the banks, with notification of the Fund of the outcomes. The review is conducted with due regard for confidentiality and the right of the person concerned by the report to provide explanations and evidence.

XI. Final Provisions

22. The PIU Environmental and Social Specialist shall organize annual training on the requirements of the Code, keep records of familiarizations and trainings, and include information on the implementation of the Code in the Program reports submitted to the World Bank.

23. Amendments and additions to the Code shall be introduced by an order of the Fund and communicated to all persons covered by it.

Appendix: Acknowledgment Form

*I, the undersigned, hereby confirm that I have received, read, and understood the **Code of Conduct for Personnel and Agents of the “EduImkon” Program**. I acknowledge my obligation to comply with all of its requirements and principles, including those relating to ethical and professional conduct, integrity, non-discrimination, equal treatment, accessibility, reasonable accommodation, prevention of conflicts of interest, confidentiality and lawful processing of personal data, prevention of fraud and corruption, zero tolerance for Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) and Gender-Based Violence (GBV), protection against retaliation, and cooperation with the Program's Grievance Redress Mechanism (GRM).*

I understand that compliance with the Code is a condition of my engagement in the Program and that violations of the Code may result in disciplinary or other measures in accordance with applicable legislation, contractual obligations, and the Program's policies and procedures.

Full name	Organization / position	Date	Signature

GRIEVANCE REDRESS MECHANISM (GRM) GUIDELINES

of the “Expanding Opportunities and Promoting Equity in Education” Program (PforR, P513279)

1. General Provisions and Objectives

1.1. These Guidelines establish a single, unified and transparent grievance redress mechanism (hereinafter — GRM) for the “EduImkon” Program, pursuant to the recommendations of the ESSA and the Program Action Plan (PAP). The GRM covers complaints and appeals from (i) applicants, students, their families and guarantors; (ii) other stakeholders; and (iii) employees of the Fund and the PIU, and personnel of the participating banks engaged in the Program (labor complaints).

1.2. The objectives of the GRM are: prompt and fair resolution of issues; identification and elimination of systemic problems in Program implementation; strengthening the trust of applicants and the public; and providing feedback for improving the Program.

1.3. The GRM operates in accordance with the Law of the Republic of Uzbekistan “On Appeals of Individuals and Legal Entities”, the Labor Code of the Republic of Uzbekistan and the requirements of the World Bank. The GRM does not limit the applicant’s right to apply to the People’s Reception Offices under the President of the Republic of Uzbekistan, to a court or to other competent authorities.

2. Principles

- Accessibility: free of charge, multiple channels, accessibility for persons with disabilities and residents of remote areas; operation in three languages — Uzbek, Russian and English.
- Transparency: public disclosure of information about the GRM on the Program platform and the websites of the Fund and the banks; regular publication of aggregated statistics.
- Confidentiality: protection of the applicant’s data; possibility of confidential submission of sensitive complaints.
- Non-retaliation: prohibition of any forms of persecution of applicants and witnesses for complaints filed in good faith.
- Timeliness: compliance with the established deadlines for registration, review and response.
- Objectivity: decisions are made only after a comprehensive assessment of the circumstances and evidence;
- Cultural appropriateness and communication in a language understandable to the complainant, where possible;
- Reasonable accommodation for persons with disabilities and support for persons with limited digital access;
- Survivor-centered and consent-based handling of sensitive complaints;
- Impartiality and conflict-of-interest screening for all persons involved in complaint review;
- No cost to complainants at any stage of complaint submission, review or appeal.

3. Types of Complaints Considered

3.1. The GRM accepts, in particular, complaints and appeals on the following issues:

- eligibility and outcomes of the review of education loan applications, including alleged errors in criteria verification;
- alleged discrimination or unfair treatment, including on the grounds of gender, disability, place of residence or social status;
- payments, charges, repayment schedules and debt collection actions by the banks;
- quality of service, availability of the talim-kreditimf.uz platform and the operation of call centers;
- personal data protection;
- violations of the Code of Conduct by Program personnel and agents;
- sensitive complaints: gender-based violence, sexual exploitation and harassment (SEA/SH) — under a separate confidential protocol (Section 7);
- barriers faced by vulnerable and disadvantaged groups in accessing education loans or complaint channels;
- lack of reasonable accommodation or accessibility for persons with disabilities;
- language, digital access or information barriers;
- labor complaints of employees (Section 8).

4. Complaint Submission Channels

4.1. A complaint may be submitted orally or in writing, including anonymously (subject to the restrictions established by legislation for official appeals), through the following channels:

Channel	Description
Online platform	Feedback section on the talim-kreditimf.uz platform (Uzbek, Russian and English languages)
Fund hotline	Tel. 71-203-50-50 (extensions: 01540, 01549, 01550); call centers of participating banks
In writing / in person	To the Education Loan Financing Fund, to branches of participating banks, or through Public Service Centers
People's Reception Offices	People's Reception Offices under the President of the Republic of Uzbekistan at the national, regional and district levels, including the Virtual Reception Office
E-mail / QR	Official e-mail addresses of the Fund and the banks; QR codes and complaint boxes at student service locations
MEF Office	Department for Handling Appeals of the Ministry of Economy and Finance

4.2. Information on all GRM channels, including contact details, is posted on the Program platform, on the websites of the Fund (imv.uz) and the participating banks, and on information boards in bank branches and universities. Accessible formats for submitting and receiving information are provided for persons with disabilities.

5. Registration and Review Procedure

5.1. All complaints, regardless of the channel of receipt, are subject to registration in the Program's unified electronic complaint log (register) within 1 business day, with the assignment of a registration number of which the applicant is notified.

5.2. Standard review stages and timelines:

Stage	Content	Timeline
1. Receipt and registration	Recording of the complaint in the register; notification of the applicant of registration	1 business day
2. Classification	Determination of the type, sensitivity level and responsible officer; conflict-of-interest check	2 business days
3. Review	Collection of information; where necessary — requesting clarifications from the applicant, the bank or the university	up to 15 days; where additional examination is required — up to 30 days, with notification of the applicant
4. Decision and response	Sending the applicant a reasoned written response explaining the appeal procedure	within the review period
5. Recording and analysis	Entering the outcome into the register; analysis to identify systemic problems	ongoing

5.3. Complaints related to payments and debt collection are considered by the relevant bank with notification of the Fund; complaints regarding eligibility and selection outcomes — by the Fund; complaints about the actions of Fund employees — by the Project Coordinator; complaints about the actions of the Coordinator or the Fund's management — by the Department for Handling Appeals of the MEF.

6. Escalation and Appeals

6.1. If the applicant is not satisfied with the response, they have the right, within 10 business days, to file an appeal to the next level:

Level	Authority	Review period
Level 1	Participating bank / responsible unit of the Fund	up to 15 days
Level 2	PIU Project Coordinator / Fund commission	up to 15 days
Level 3	Department for Handling Appeals of the Ministry of Economy and Finance	up to 15 days
External mechanisms	People's Reception Offices under the President, courts; World Bank Grievance Redress Service (GRS, grievances@worldbank.org)	in accordance with legislation and WB procedures

6.2. At each level, the applicant is provided with an explanation of the reasons for the decision taken and of further appeal options.

7. Confidential Protocol for Sensitive Complaints (GBV/SEA/SH)

7.1. Complaints related to gender-based violence, sexual exploitation and harassment (GBV/SEA/SH) are handled under a separate confidential protocol integrated into the GRM, applying a survivor-centered approach.

- Such complaints are received by a specially designated and trained officer (the PIU E&S Specialist — sensitive complaints coordinator); access to information is restricted on a “need-to-know” basis.
- Only the nature of the incident and the age and gender of the survivor (with their consent) are recorded; details of the incident are not requested beyond what is necessary, and repeated interviews are not permitted.
- With the survivor’s consent, referral is made to support services (medical, psychological and legal assistance), with which the Fund establishes partnership arrangements; the contact details of the support services are attached to the internal protocol.
- The Fund immediately notifies the World Bank of Program-related cases in an anonymized form that does not disclose the identity of the survivor.
- The timelines of the review stages may be adjusted in the interests of the survivor’s safety; the principle of confidentiality is observed at all stages, including the storage of materials.

8. Handling of Employees’ Labor Complaints

8.1. Employees of the Fund and the PIU, and personnel of the banks engaged in the Program, have the right to file complaints regarding working conditions, the actions of managers and colleagues, discrimination and other labor-related matters, orally or in writing, including confidentially.

8.2. To review a labor complaint in the Fund, a complaint review commission is formed within 5 days of its receipt, with its composition approved by the Director of the Fund. The permanent members of the commission are the HR specialist and the lawyer; when a complaint filed by a permanent member of the commission is reviewed, that member is recused from participation.

8.3. The commission reviews the complaint no later than 10 business days from the date of its establishment. Sessions may be open or closed (closed — where necessary to protect the applicant’s confidentiality). The applicant has the right to participate in person or through a representative, to submit evidence and to receive information on the progress of the review. Decisions are made by open vote; in the event of a tie, the chairperson has the casting vote; the quorum is at least 70% of the members.

8.4. The commission’s decision is approved by the Director of the Fund and sent to the applicant within 5 business days. An appeal may be filed with the Director of the Fund within 10 business days; if the appeal is found justified, an appeal commission is established and reviews it within 5 business days. In the banks, labor complaints are handled under the banks’ internal procedures in compliance with the principles of these Guidelines.

8.5. The applicant, their representative and their family members may not be subjected to criticism, dismissal or any other persecution in connection with the filing of a complaint. Use of the GRM does not deprive an employee of the right to apply to the State Labor Inspectorate, a labor dispute commission or a court.

9. Monitoring, Reporting and Information Disclosure

9.1. The PIU Environmental and Social Specialist maintains a unified complaint register, monitors compliance with deadlines and the implementation of decisions, submits a quarterly analytical report to the Fund's management (number, types, timelines, outcomes, systemic issues) and includes a section on the operation of the GRM in the Program reports submitted to the World Bank.

9.2. Aggregated GRM statistics (without personal data) are published on the Program platform at least once every six months. Monitoring indicators: the share of complaints resolved on time; the share of decisions appealed by applicants; the average review time; and the share of sensitive complaints referred to support services.

9.3. Information on the results of the GRM's operation is used in updating the Social Inclusion (Equal Access) Guidelines and the Program Operations Manual (POM), and in personnel training.

10. Final Provisions

10.1. These Guidelines are subject to public disclosure on the Program platform and the Fund's website. Amendments are introduced by an order of the Fund in agreement with the World Bank in the cases provided for by the legal agreements.

10.2. These Guidelines have been developed in accordance with the Law of the Republic of Uzbekistan "On Appeals of Individuals and Legal Entities", the Labor Code of the Republic of Uzbekistan, and the requirements of the World Bank Policy and Directive on Program-for-Results (PforR) Financing.