

## 1 BASIC PROVISIONS

- 1.1 General Provisions
- 1.2 Objectives of the Policy
- 1.3 Legal and methodological foundations of the Policy

## 2 APPLICATION AREA

## 3 DEFINITIONS OF TERMS AND ABBREVIATIONS

## 4 KEY PRINCIPLES OF ANTI-CORRUPTION

- 4.1 The principle of "zero tolerance" for corruption
- 4.2 Principle of legality
- 4.3 The principle of prevention, consistency and integration of the implemented anti-corruption measures
- 4.4 Principle of openness and transparency
- 4.5 Principle of due diligence
- 4.6 The principle of responsibility and inevitability of punishment
- 4.7 Principle of confidentiality and non-retaliation
- 4.8 Principle of continuous improvement of the anti-corruption system

## 5 ELEMENTS OF ANTI-CORRUPTION SYSTEM

- 5.1 Availability of fundamental anti-corruption documents
- 5.2 "Tone from above"
- 5.3 Identification and assessment of corruption risks
- 5.4 Anti-corruption procedures
- 5.5 Availability of persons and units responsible for combating corruption
- 5.6 Information, communication and consultation
- 5.7 Anti-corruption monitoring, control and reporting
- 5.8 Response to identified violations and prosecution
- 5.9 Broadcasting anti-corruption principles and procedures to Subsidiaries

## 6 ANTI-CORRUPTION PROCEDURES

- 6.1 Conflict of interest management
- 6.2 Interaction with contractors and third parties
- 6.3 Interaction with Government Bodies, Businesses or Institutions and Government Officials
- 6.4 Gifts and hospitality
- 6.5 Political funding
- 6.6 Charity and sponsorship
- 6.7 Recruitment, promotion, material incentives
- 6.8 Record keeping

## 7 REPORTING ABUSE

## 8 CONSULTING EMPLOYEES

## 9 PROCEDURE FOR MAKING CHANGES

## **BASIC PROVISIONS**

### **1.1 General**

1.1.1 Joint Stock Company Uzkimyosanoat (hereinafter referred to as the “Company”) strives to adhere to consistently high standards of ethical, conscientious and socially oriented conduct of financial and economic activities, paying special attention to the development, implementation and subsequent monitoring of the implementation of policies and procedures aimed at countering corruption.

1.1.2 The anti-corruption policy of the Company (hereinafter referred to as the “Policy”) is an internal regulatory document of the Company that defines the basic principles and elements of the anti-corruption system, as well as measures aimed at preventing corruption and compliance by the Employees with the norms of applicable international anti-corruption legislation and anti-corruption legislation of the Republic of Uzbekistan.

1.1.3 The Company's anti-corruption initiatives are aimed at:

- prevention of corruption;
- identification, suppression and investigation of corrupt practices;
- minimization and / or elimination of the consequences of corrupt practices.

### **1.2 Objectives of the Policy**

1.2.1 This Policy has been developed in order to:

- confirmation of the Company's adherence to the principle of "zero tolerance" to corruption;
- creation and maintenance in the Company of a corporate culture of rejection and inadmissibility of any Corrupt actions;
- understanding by the Counterparties and the general public of the anti-corruption principles and requirements of the Company in order to reduce corruption risks;
- generalization of the principles, goals, objectives and measures to minimize the risk of involvement of the Company and its Employees in corruption activities.

### **1.3 Legal and methodological foundations of the Policy**

1.3.1 This Policy is based on the principles and norms contained in the following regulatory documents:

- Law of the Republic of Uzbekistan "On Combating Corruption" No. 3PY-419 dated January 3, 2017;
- Criminal Code of the Republic of Uzbekistan;
- Code of the Republic of Uzbekistan on administrative responsibility;
- United Nations Convention against Corruption, adopted on 31 October 2003 by Resolution 58/4 at the 51st plenary meeting of the 58th session of the UN General Assembly in New York;
- The OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions, adopted on November 21, 1997 in Istanbul.

1.3.2 The methodological foundations of the Policy are:

- International standard ISO 37001: 2016 "Anti-bribery management systems - Requirements and recommendations for use".

## **2 SCOPE**

2.1.1 The principles and requirements of this Policy are mandatory for all Employees, regardless of their position.

2.1.2 Each Employee, including members of the Board of the Company, when hiring in the Company and in other cases provided for by this Policy, must familiarize themselves with this Policy against signature and comply with its provisions.

2.1.3 Other internal regulatory documents of the Company must not contradict this Policy. In the event of conflict, this Policy shall prevail.

### **3 DEFINITIONS OF TERMS AND ABBREVIATIONS**

#### **3.1.1 Introduced terms and definitions:**

Shareholder - the state represented by the Agency for State Assets Management of the Republic of Uzbekistan.

Anti-corruption clause - special provisions included in the contracts of the Company, which oblige the parties to comply with the requirements of the Applicable anti-corruption legislation in the course of fulfilling their obligations under the contract.

Close relatives - persons who are related or related to the Employee, that is, parents, blood brothers and sisters, spouses, children, including adopted children, grandfathers, grandmothers, grandchildren, as well as parents, blood brothers and half brothers and the sisters of the spouses.

Government Official:

- any person holding an appointed or elective position in the legislative, executive or judicial branch of the Republic of Uzbekistan or a foreign state;
- any person performing state functions for the Republic of Uzbekistan or a foreign state, including for a State body, enterprise or institution,
- any official or representative of an international organization;
- politicians, officials of political parties, including candidates for political office.

State functions - any activity delegated by the state and carried out in the interests of the state, for example, related to public procurement.

State bodies, enterprises and institutions - public authorities, citizens' self-government bodies (including ministries, services, agencies and departments) and their structural divisions, as well as all legal entities directly or indirectly controlled by the state.

Subsidiary (DO) - an organization or an enterprise in the authorized capital of which there is a predominant share of Uzkimyosanoat JSC, or under the direct or indirect control of Uzkimyosanoat JSC in accordance with an agreement concluded between such an organization or enterprise and Uzkimyosanoat JSC or on other grounds.

A bona fide message is a message from an Employee or another person through available channels of information about Corruption actions related to the Company or its Employees, in which such an Employee / person is genuinely convinced that the information provided by him is reasonable.

Business hospitality - expenses of third parties for or in the interests of the Employees related to the establishment and / or maintenance of cooperation, carried out in the course of business, including the costs of third parties for business dinners, travel costs, living expenses, entertainment, etc.

Counterparty - any individual, except for the Employees, or a legal entity (including its branch and / or representative office) with which the Company enters into contractual relations.

Confidential information is information in any form, the receipt, processing, transfer or use of which is limited in accordance with the legislation of the Republic of Uzbekistan and / or internal regulatory documents of the owner of such information, including:

- State secrets - of special importance, top secret and secret military, political, economic, scientific and technical and other information of the Republic of Uzbekistan, protected by the state and limited by special lists;
- Commercial secret - information that has commercial value in scientific and technical, technological, production, financial and economic and other spheres due to its unknown to third parties, to which there is no free access on a legal basis and the owner of this information takes measures to protect its confidentiality.

Conflict of Interest is a situation in which the Personal Interest (direct or indirect) of the Employee affects or may affect the proper performance of his job or official duties and in which a contradiction arises or may arise between the Personal Interest of the Employee and the rights and legitimate interests of the Company.

Corruption offense - an act with signs of corruption, for the commission of which the applicable anti-corruption legislation provides for liability.

Corrupt actions:

- an offer, promise, authorization, transfer of Illegal Benefits to a Government Official (bribery, bribery), a representative of a commercial organization (commercial bribery) or any other person in order to influence his actions (ensure inaction) and induce him to perform his official duties in an improper manner and / or to obtain an improper advantage, including a commercial one, for the Company;
  - making Facilitation Payments;
  - demand, extortion or request, consent to receive or receive Illegal benefit from any person for the purpose of unlawful use of his official position, as well as abuse of office
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- position, abuse of authority, as well as other illegal use by the Employee of his official position contrary to the legitimate interests of the Company, including with the aim of obtaining Illegal benefits for himself or third parties;
  - mediation in bribery or commercial bribery, including the transfer of the Illegal Benefit to the recipient, or assisting the recipient or the transferor in reaching or enforcing an agreement between them to receive and give the Illegal Benefit;
  - other actions / inaction of the Employees containing signs of corruption or contributing to its commission, including manifestations of a conflict of interest.

Corruption is the illegal use by a person of his official or official position for the purpose of obtaining material or non-material benefits in his personal interests or in the interests of other persons, as well as illegal provision of such benefits.

Personal interest - the interest of the Employee and / or his Close relative, associated with the possibility of receiving by him and / or his Close relatives of funds, other property, including property rights, property services, the results of work performed or any other benefits (advantages ).

International organization - any international organization created by states, governments or other international organizations, regardless of organizational form and powers, including, for example, regional organizations for economic integration.

Illegal benefit - cash or other property or property rights, benefits, services, intangible assets, any other tangible or intangible benefit that is promised, offered, provided or received without a legal basis.

Society - Joint Stock Company "Uzkimyosanoat".

Facilitation payments - cash or other property, benefits, services, intangible assets, any other tangible or intangible benefit that is improperly provided for the purpose of ensuring or accelerating the implementation of the standard procedure for performing established procedures or actions that are not provided for by the relevant legislative and regulatory rules and regulations.

The Policy is a real Anti-Corruption Policy.

Applicable anti-corruption legislation - anti-corruption legislation of the Republic of Uzbekistan, international anti-corruption legislation ratified by the Republic of Uzbekistan, and anti-corruption legislation of the states on the territory of which the Company operates.

Anti-corruption system - a system of interrelated elements specified in section 5 of this Policy, aimed at anti-corruption.

Employees - for the purposes of this Policy, this definition includes employees of the Company who perform their duties on the basis of employment contracts concluded with them, as well as members of the Board of the Company.

3.1.2 The terms used, but not defined in this Policy, are used in the sense in which they are used in other internal regulatory documents of the Company and the legislation of the Republic of Uzbekistan.

#### **4 KEY PRINCIPLES OF ANTI-CORRUPTION**

#### 4.1 The principle of "zero tolerance" for corruption

4.1.1 In the process of conducting its activities, including in the framework of interaction with Counterparties, State bodies, enterprises or institutions and State officials and other persons, the Company adheres to the principle of rejection of any forms and manifestations of corruption (the principle of "zero tolerance" to corruption) ...

For Employees, this means an obligation not to commit Corrupt Practices, including:

- not offer, promise, authorize, transfer monetary funds or other property or property rights, benefits, benefits, services, intangible assets, any other benefits of an intangible or non-monetary nature to a Government Official (bribe, bribery), a representative of a commercial organization (commercial bribery) or any other person in order to influence his actions (ensure inaction) and induce him to perform his official duties in an inappropriate manner and / or to obtain an inappropriate commercial advantage for the Company;
- not make Facilitation Payments;
- not demand, extort or ask, and also not agree to receive or receive money or other property or property rights, benefits, benefits, services, intangible assets, any other benefits of an intangible or non-monetary nature from any persons for the purpose of illegal use his official position contrary to the legitimate interests of the Company, including for the purpose of obtaining the above material and non-material values for himself or for third parties;
- not mediate in bribery or commercial bribery, including not transferring the above tangible and intangible assets to the recipient, or assist the recipient or the transferor in reaching or implementing an agreement between them to obtain the above tangible or intangible assets;
- not to commit other actions / omissions of the Employees that contain signs of corrupt actions or contribute to their commission, including manifestations of a conflict of interest.

#### 4.2 Principle of legality

4.2.1 Anti-corruption measures in the Company are implemented in accordance with the requirements of the legislation of the Republic of Uzbekistan, international legislation ratified by the Republic of Uzbekistan, and taking into account the applicable leading world anti-corruption practices, as well as in strict accordance with the internal regulations of the Company.

4.2.2 The Company and its Employees are obliged to comply with the legislation of the Republic of Uzbekistan, as well as the anti-corruption requirements of international acts and regulations of foreign states, on the territory of which the Company conducts or plans to operate.

#### 4.3 The principle of prevention, consistency and integration of the implemented anti-corruption measures

4.3.1 The Company gives priority to the implementation of preventive measures and procedures aimed at eliminating the causes and conditions conducive to the commission of Corruption Actions and the implementation of corruption risks.

4.3.2 The Company strives to make anti-corruption measures and procedures as transparent, clear, feasible and reasonably responsive to the identified risks as possible.

4.3.3 The implemented anti-corruption measures and procedures are combined into an anti-corruption system integrated into all areas of the Company's activities.

#### 4.4 Principle of openness and transparency

4.4.1 The Company informs Employees, Counterparties, partners and the public about the adopted anti-corruption principles and requirements, including posting this Policy and publishing on a periodic basis an overview of the main implemented anti-corruption measures and the results achieved in free access on the official website of the Company and on the official the pages of the Society in social networks.

#### 4.5 Principle of due diligence

4.5.1 The Company makes reasonable efforts to minimize the risk of business relations with persons who may be involved in corrupt activities. In order to implement this principle, before making a decision to start or continue business relations, the Company checks the Counterparties for reliability. Such a check, among other things, is aimed at identifying corruption risks associated with relations with Counterparties.

4.5.2 Before making a decision to hire or before concluding a civil law contract, the Company checks the business reputation of candidates for employment, including for the absence of corruption risks and conflicts of interest.

4.6 The principle of responsibility and inevitability of punishment

4.6.1 Employees, regardless of their position, length of service, status and other factors, are personally responsible for compliance with the principles and requirements of this Policy and Applicable anti-corruption legislation.

4.7 Principle of confidentiality and non-retaliation

4.7.1 The Company guarantees that no sanctions, including dismissal, demotion, deprivation of remuneration, discrimination, harassment, harassment, will be applied to Employees who refuse to commit Corruption or other actions that would violate the requirements of the Applicable anti-corruption legislation or of this Policy, even if as a result of such a refusal the Company did not gain commercial and / or competitive advantages and / or incurred losses.

4.7.2 The Company also considers it unacceptable to use any retaliatory measures against Employees who in good faith reported a Corruption Act or a possible violation of anti-corruption principles and requirements of this Policy by another Employee of the Company.

4.7.3 The Company ensures the confidentiality and protection of information received through the channels of reporting violations.

4.8 Principle of continuous improvement of the anti-corruption system

4.8.1 The Company pays special attention to continuous improvement of the anti-corruption system in order to increase its efficiency.

4.8.2 The Company encourages its Employees to propose recommendations and measures to improve the Company's anti-corruption system.

## **5 ELEMENTS OF ANTI-CORRUPTION SYSTEM**

In an effort to ensure the effectiveness of anti-corruption activities, the Company pays special attention to the development of the following basic elements of the anti-corruption system:

5.1 Availability of fundamental anti-corruption documents

5.1.1 The Company's anti-corruption system is based on the principles and requirements reflected in this Policy, the Company's Anti-Corruption Program, the Code of Business Conduct and the Conflict of Interest Management Policy, developed taking into account the Applicable anti-corruption legislation and the world's leading anti-corruption practices.

5.2 "Tone from above"

5.2.1 Members of the Supervisory Board and the Management Board of the Company, as well as heads of structural divisions (departments, departments, etc.) must, by their personal example, form an irreconcilable attitude among the Employees towards any forms and manifestations of Corruption actions and thus contribute to the creation of a standard of ethical behavior and corporate culture " zero tolerance "to corruption in the Company.

5.2.2 Members of the Supervisory Board and the Management Board of the Company, as well as heads of structural divisions (departments, departments, etc.) demonstrate leadership in building and implementing an effective anti-corruption system by:

- active participation in the development, implementation, monitoring and improvement of anti-corruption measures;
- implementation of general current control over the implementation and operational efficiency of the anti-corruption system;

- external and internal communication, incl. advising subordinate Employees on anti-corruption issues and the need to comply with relevant norms and requirements (including through periodic speeches, mailings and publications);

- provision of the necessary material and technical resources for the implementation of anti-corruption measures.

5.2.3 The Company makes reasonable efforts to prevent members of the Supervisory Board and Management Board, as well as heads of the Company's structural divisions (departments, departments, etc.) from being previously involved in illegal activities, including corruption.

### 5.3 Identification and assessment of corruption risks

5.3.1 The Company regularly (at least once every two years, as well as as necessary) carries out activities to identify and assess / re-evaluate corruption risks in the manner prescribed in the Methodology for the identification and assessment of corruption risks of the Company.

5.3.2 As part of the identification and assessment / reassessment of corruption risks, the peculiarities of the organizational structure of the Company are taken into account and all areas of activity are analyzed in order to determine the processes most susceptible to corruption risk, including the existing anti-corruption controls and procedures in them for their sufficiency to reduce the identified risks.

5.3.3 The Company pays special attention to the risks characteristic of the regions where its activities are carried out, and also takes into account in the assessment the entire completeness of information on development plans, including investment and strategic projects, as well as changes in legislation, political and economic situation and other external factors, which may have an impact on the activities of the Company.

5.3.4 The heads of the relevant divisions of the Company take part in the process of identifying and assessing risks with active support from the Compliance Service, which coordinates the process and prepares generalized assessment results.

5.3.5 The results of the assessment / reassessment of corruption risks are submitted for consideration by the Management Board of the Company and are the basis for improving the anti-corruption measures and procedures of the Company and the development of the Anti-Corruption Program for the relevant period.

5.3.6 Taking into account the Company's adherence to the principle of "zero tolerance" to corruption, it recognizes the need to manage corruption risks regardless of the likelihood of their occurrence and the degree of impact on the Company.

### 5.4 Anti-corruption procedures

5.4.1 Based on the results of the assessment / reassessment of risks, the Company implements anti-corruption controls and procedures in its processes and activities, commensurate with the identified risks.

5.4.2 The anti-corruption procedures implemented are specified in Section 6 of this Policy, as well as reflected in the Anti-corruption program and enshrined in other internal regulatory documents of the Company.

### 5.5 Availability of persons and units responsible for combating corruption

5.5.1 In order to build an effective anti-corruption system, the Compliance Service is created in the Company.

5.5.2 The Compliance Service is subordinate to the Chairman of the Management Board of the Company and the Supervisory Board.

5.5.3 Employees of the Compliance Service have the necessary experience and competencies, as well as have the independence, authority and resources sufficient to carry out their functions, effectively implement and improve the Company's anti-corruption system.

5.5.4 The Compliance Service performs, among other things, the following functions:

- Prevention and counteraction of corruption actions in the Company;

- Organization, coordination and generalization of the results of the assessment of corruption risks;
- Development and improvement of policies, procedures, methodological recommendations, proposals for amendments to the internal regulatory documents of the Company on anti-corruption issues;

- Development of training programs and direct training of Employees on anti-corruption issues;
- Advising Employees on anti-corruption issues;
- Participation in the investigation of Corruption Actions, including when considering issues of bringing Employees to responsibility for committed offenses;
- Monitoring the implementation of anti-corruption measures and procedures in the Company;
- Assessment of the sufficiency, proportionality and relevance of existing anti-corruption measures and procedures in the Company, as well as taking measures to improve them;
- Drawing up regular reports on the current state of the anti-corruption system in the Company for the Supervisory Board and the Management Board of the Company;
- Other powers established by legislation and internal regulations of the Company.

5.5.5 In addition to the Compliance Service, other Employees and divisions also participate in the formation of an effective anti-corruption system in the Company. The responsibilities of the responsible Employees and divisions for the implementation of anti-corruption measures are enshrined in the internal regulations of the Company.

#### 5.6 Information, communication and consultation

5.6.1 In order to reduce corruption risks and raise awareness of Employees and Counterparties, as well as the general public about anti-corruption principles and requirements adopted in the Company, this Policy and some other policies of the Company in the field of anti-corruption are posted on the official website of the Company and on the official the pages of the Society in social networks.

5.6.2 The Company makes reasonable efforts to inform and explain the norms of the Applicable anti-corruption legislation and anti-corruption principles and requirements of the Company to Employees and Counterparties by:

5.6.3 conducting regular and systematic anti-corruption training and testing:

- for new Employees - within 60 days from the date of employment;

annually for all Employees in order to maintain knowledge and skills in the field of anti-corruption at the proper level;

- in the event of significant changes in anti-corruption measures, policies and procedures - for Employees to whom the relevant anti-corruption measures, policies and procedures are applied;

- if deficiencies in the anti-corruption system are revealed, including insufficient knowledge and skills of the Employees in the field of anti-corruption - for Employees who have violated the anti-corruption principles and procedures provided for by this Policy and other internal regulations of the Company;

- for Employees who did not complete the testing based on the training results and in other applicable cases;

- special training and testing on anti-corruption issues - for Employees holding positions with increased corruption risk and positions related to anti-corruption control functions;

5.6.4 conducting anti-corruption campaigns using thematic audio and video clips and other information materials aimed at raising awareness of the Employees about the anti-corruption measures implemented in the Company and with the aim of forming a culture of “zero tolerance” to corruption in them;

5.6.5 providing available communication channels for reporting Corruption Actions related to the Company, its Employees or Counterparties, etc. (details are specified in Section 7 of this Policy);

5.6.6 inclusion of anti-corruption provisions in the employment contracts of the Employees;



5.6.7 informing the Counterparties about the adopted anti-corruption principles and requirements of the Company, including through the inclusion of Anti-corruption clauses in contracts with them;

5.6.8 holding briefings with the participation of the media on anti-corruption measures implemented in the Company, etc.

#### 5.7 Anti-corruption monitoring, control and reporting

5.7.1 The Company monitors and controls compliance with the implemented anti-corruption requirements and procedures, as well as evaluates their effectiveness, sufficiency and proportionality, including:

- analysis of the impact of changes in the Company's activities, its organizational and functional structure and other external and internal factors on the Company's anti-corruption system and the need to adjust it, including ensuring its compliance with the requirements of the legislation of the Republic of Uzbekistan;
- regular monitoring on a selective basis (in accordance with the approved plan) of the Company's internal processes to identify ineffective anti-corruption measures and procedures in order to improve them and ensure the reliability and efficiency of the Company's anti-corruption system;
- conducting internal and / or external audits in order to control compliance by the Employees with the anti-corruption principles and requirements of the Company;
- control over the timely and proper implementation of anti-corruption • activities assigned to the Compliance Service and other structural divisions of the Company.

5.7.2 The results and results of measures to monitor and control the anti-corruption system are reflected in:

- quarterly reports to the Management Board;
- annual reports for the Management Board, Supervisory Board and Shareholder;
- reports on the results of internal and / or external audits submitted to the Chairman of the Management Board and / or to the Supervisory Board.

5.7.3 The content of the reports is determined by the internal regulations of the Company. The key results of the Company's activities in the field of combating corruption can be published on the official website of the Company.

5.7.4 The Company regularly conducts internal and external audits of financial and economic activities, as well as continuously monitors the completeness and correctness of the reflection of all business transactions in accounting and compliance with the requirements of the applicable legislation and internal regulatory documents of the Company.

#### 5.8 Response to identified violations and prosecution

5.8.1 Taking into account the principle of responsibility and inevitability of punishment, all Employees are personally responsible for compliance with the principles and requirements of this Policy, other anti-corruption policies and procedures of the Company, as well as Applicable anti-corruption legislation.

5.8.2 In response to Corruption-related messages sent to the Hotline or through other channels of reporting violations, as well as in relation to each reasonably justified suspicion or established fact of Corruption actions in the Company, an internal investigation is initiated in accordance with the internal regulations of the Company ...

5.8.3 Employees who violate the established anti-corruption principles and requirements of the Company and the Applicable Anti-Corruption Laws are subject to disciplinary, administrative, civil or criminal liability in the manner and on the grounds provided for by the legislation of the Republic of Uzbekistan and the internal regulations of the Company.

5.8.4 Members of the Board of the Company, as well as heads of its structural divisions (departments, departments, etc.) are responsible for committing corruption offenses, both for themselves and for persons under their control.

5.8.5 In case of revealing Corruption actions in the Company, the analysis of the reasons and possibilities for their commission is carried out and, if necessary, the implemented anti-corruption measures and procedures are improved.

5.8.6 The Company cooperates with law enforcement and other State bodies, enterprises or institutions in order to identify and investigate Corruption Actions and apply sanctions against Employees of the Company who have committed a corruption offense.

5.9 Broadcasting anti-corruption principles and procedures to Subsidiaries

5.9.1 The Company makes reasonable efforts to ensure that the key anti-corruption principles and requirements established by it are also observed in its Subsidiaries and joint ventures.

5.9.2 In order to broadcast anti-corruption principles and procedures to Subsidiaries, the Company:

- initiates in Subsidiaries the introduction of anti-corruption policies and procedures similar to those in force in the Company;
- initiates the appointment of employees in the Subsidiaries responsible for combating corruption and interacting with the Company;
- provides operational advice and interaction with Subsidiaries on information, anti-corruption training, risk assessment, as well as on other issues that may arise in the activities of Subsidiaries in terms of anti-corruption;
- periodically monitors and verifies compliance with anti-corruption principles and requirements in Subsidiaries, as well as evaluates the effectiveness of the anti-corruption system of Subsidiaries in general, etc.

## **6 ANTI-CORRUPTION PROCEDURES**

6.1 Conflict of interest management

6.1.1 Employees of the Company, within the framework of fulfilling their official duties and representing the interests of the Company, must be guided by the principles of good faith and honesty, not use their official position for private interests and avoid situations that may lead to a conflict of interest.

6.1.2 The Company has adopted a Conflict of Interest Management Policy, which stipulates the process of identifying situations of conflict of interest, the procedure and those responsible for their consideration and settlement. In particular, it is provided for:

- disclosure of information on the presence / absence of a conflict of interest when hiring;
- disclosure of information on the presence / absence of a conflict of interest during rotation or appointment to a new position;
- annual declaration of information on the presence / absence of a conflict of interest;
- disclosure of information on the existence of a conflict of interest as it arises.

6.1.3 The Company provides an objective and timely consideration of all declared and identified situations of conflict of interest in the manner prescribed in the Policy on managing the conflict of interest of the Company.

6.2 Interaction with contractors and third parties

6.2.1 Following the principle of due diligence, the Company seeks to cooperate with Counterparties who share its anti-corruption principles and strictly comply with the requirements of applicable anti-corruption legislation.

6.2.2 The Company does not involve suppliers, contractors and other third parties (including traders, trading houses, etc.) to make any payments and / or actions that contradict the principles and requirements of this Policy, as well as create a corruption risk.

6.2.3 In relations with Counterparties, the Company adheres to the principles of legality and transparency, ensuring an honest, open and transparent selection of suppliers, contractors and other Counterparties, based on the use of objective selection criteria, as well as a transparent procedure for determining the cost of purchased goods, works, services that are regulated applicable law and internal regulations of the Company.

6.2.4 When interacting / cooperating with Counterparties, the Company:

- checks the reliability of potential Counterparties, including for the commission of corruption offenses in the past, the presence of a conflict of interest with Employees and the Company, and other corruption risks;
- informs potential Counterparties (the winner of the tender, the tender and the procurement counterparty under direct contracts) about their anti-corruption principles and requirements by including the Anti-corruption clause in the contracts.

6.2.5 The Company applies procedures for checking counterparties also in the framework of investment and innovation activities, namely when the Company acquires or sells a stake in any legal entities, creates joint ventures or provides financing for innovative projects. Verification procedures include not only examining the acquisition target / partner / recipient of financing, its owners and management, but also verifying the purpose and procedure for executing the transaction for compliance with the requirements of this Policy and Applicable Anti-Corruption Laws.

6.2.6 It is prohibited in the Company to conclude any agreements (written or oral) with Counterparties that are not included in the main text of the agreement, annexes thereto, or are not confirmed in another established form, and have not passed the approval procedures adopted by the Company. Any concluded agreement must fully contain all the conditions and agreements of the parties.

6.2.7 In the event of situations of persuasion to commit Corruption on the part of Counterparties, Employees are obliged to immediately inform their immediate supervisor, to the Compliance Service or through the reporting channels of violations (including the Helpline) of the Company.

6.3 Interaction with Government Bodies, Businesses or Institutions and Government Officials

6.3.1 The interaction of Employees with State bodies, enterprises or institutions and State officials is carried out strictly in accordance with the principles and requirements set forth in this Policy, other internal regulatory documents of the Company and provided for by the legislation of the Republic of Uzbekistan.

6.3.2 The Company does not make, directly or through intermediaries, illegal payments in favor of Government officials and / or their Close relatives (including in their interests) in order to obtain any unlawful advantages in connection with the activities of the Company, including the provision of monetary rewards to them , as well as payment of the expenses of such persons for recreation, transport, food, entertainment, PR campaigns, provision of loans to them, provision of gratuitous services and other remuneration.

6.3.3 In the event of situations of persuading the Employees of the Company to commit Corruption Actions by Government Officials exercising control and supervisory functions in relation to the Company, Employees of the Company must immediately inform their immediate supervisor, the Compliance Service or through the channels of reporting violations (in including to the “Helpline”) of the Company, as well as to the “hot line” of the relevant State body, enterprise or institution, or directly to law enforcement agencies.

6.3.4 In case of violation by State officials of the procedure for carrying out control and supervisory measures in relation to the Company, the Company uses the methods of appealing against the actions of State officials provided for by the legislation of the Republic of Uzbekistan.

6.4 Gifts and hospitality

6.4.1 Employees have the right to give and receive business gifts, as well as make entertainment expenses and accept business hospitality, provided they fully comply with the principles and requirements set forth in this Policy, other internal regulatory documents of the Company and the legislation of the Republic of Uzbekistan.

6.4.2 All gifts given or received by the Employees in the course of their duties, as well as the entertainment expenses they carry out and the hospitality they receive, must meet the following criteria:

- be reasonably justified, proportionate and carried out within the limits established by the Policy on gifts and entertainment expenses of the Company;
- be directly related to the legitimate goals of the Society's activities (for example, carried out within the framework of traditional, national and professional holidays);
- must not be expressed in the form of cash / non-cash funds or their equivalents and be luxury goods;
- should not be hidden illegal remuneration in order to obtain any unlawful advantages in connection with the activities of the Company;
- should not create a reputational risk for the Company in the event of disclosure of information on the provision or receipt of any gift or entertainment expenses or acceptance of business hospitality;
- must comply with the internal requirements of the organization, the employee of which the gift is being donated or in respect of which the entertainment expenses are made.

6.4.3 Additional requirements, acceptable limits in relation to giving and receiving business gifts, business hospitality and entertainment expenses are reflected in the Policy on gifts and entertainment expenses of the Company.

#### 6.5 Political funding

6.5.1 The Society does not finance political activities and in any other way does not support political organizations, parties, movements and initiatives, their candidates and members, election and campaigning campaigns and other political events.

6.5.2 At the same time, the Employees have the right to personally engage in political activities, to be members of political parties and movements, provided that such participation:

- does not contradict this Policy, other internal regulatory documents of the Company and the legislation of the Republic of Uzbekistan;
- carried out at the expense of the Employees in their free time;
- is not associated with the Company and / or its activities, does not damage the reputation of the Company and is not carried out with the aim of obtaining unlawful advantages for the Company;
- does not contradict the rights and obligations of the Employees within the framework of the performance of their official duties;
- in the event that the Company makes deductions from the wages of Employees for purposes related to political activity, such deductions are made only if there is a written application from the Employee.

#### 6.6 Charity and sponsorship

6.6.1 The Company carries out charitable and sponsorship activities in strict accordance with the principles and requirements set forth in this Policy, other internal regulatory documents of the Company and the legislation of the Republic of Uzbekistan.

6.6.2 The charitable and sponsorship provided by the Company is carried out in order to provide support to charitable and public organizations and foundations, social facilities and certain groups of the population and does not constitute a hidden form of illegal remuneration in order to obtain any unlawful advantages in connection with the activities of the Company.

6.6.3 The Society makes reasonable efforts to control the intended use of the provided charitable and sponsorship assistance, and also publishes basic information about the assistance provided on its official website.

6.6.4 Directions / goals, the procedure for consideration, approval and provision of charitable and sponsorship assistance by the Company are reflected in the Policy on charitable and sponsorship activities of the Company.

6.6.5 At the same time, the Employees have the right to personally engage in charity and sponsorship activities subject to the conditions specified in clause 6.5.2 of this Policy.

#### 6.7 Recruitment, promotion, material incentives

6.7.1 The process of selection and assessment of the activities of the Employees of the Company, including the payment of bonuses, the establishment of bonuses and other types of

remuneration, is transparent, equal and objective for all Employees and complies with the principles and requirements set forth in this Policy, other internal regulatory documents of the Company and legislation of the Republic of Uzbekistan.

6.7.2 The Company seeks to prevent labor relations with persons who participated in corrupt or other activities that contradict the ethical principles established by the Company and / or the requirements of this Policy.

#### 6.8 Record keeping

6.8.1 The Company complies with the requirements of the legislation of the Republic of Uzbekistan in the field of accounting and tax accounting and reporting.

6.8.2 The Company provides reliable, correct and with a sufficient level of detail reflection and documentation of all financial transactions in accounting, as well as access to relevant documents for verification. The Company does not carry out operations and does not use documents that are not reflected in the accounting records or that incorrectly reflect the nature of operations.

6.8.3 Distortion or falsification of the accounting, management, tax reporting of the Company, absence or insufficient detailing of primary accounting documents, illegal corrections in documents and reports, as well as deliberate damage or destruction of such documentation before the established deadline, including in order to conceal corruption payments, are prohibited in the Society.

6.8.4 In accordance with internal regulatory documents and in accordance with the legislation of the Republic of Uzbekistan, the Company has appointed an Employee who is personally responsible for the preparation and provision of complete and reliable financial statements.

## 7 REPORTING ABUSE

7.1.1 Employees, Counterparties of the Company and other persons, if they have doubts about the legality, legitimacy or ethics of the actions of Employees of the Company, including if there are suspicions of Corruption Actions, must report them through one of the following information channels:

- by phone + 99781407448;
- by e-mail [uzkimyosanoat@uks.uz](mailto:uzkimyosanoat@uks.uz);
- by mail 100011, Tashkent, st. Navoi, 38;
- through the form posted on the official website of the Company;
- to the immediate supervisor (applicable exclusively to the Employees of the Company);
- directly to the Compliance Service: [anticorruption@uks.uz](mailto:anticorruption@uks.uz)
- to law enforcement agencies.

7.1.2 The Company shall ensure registration, objective and timely consideration of all reports of Corruption Actions in the manner prescribed by the internal regulatory documents of the Company and the requirements of the legislation of the Republic of Uzbekistan.

7.1.3 Messages submitted anonymously are also accepted for consideration. However, in such a case, the applicant, who wished to remain anonymous, acknowledges that:

- The company will not be able to contact the applicant for additional information and feedback on the received message;
- The company may be limited in its ability to conduct a complete and comprehensive verification of the message if the information provided is incomplete.

7.1.4 The Company, including the Employees responsible for accepting, processing and reviewing messages about Corruption Actions, within their powers and available capabilities, ensure the confidentiality of the person who provided reliable information about the Corruption Action (except as provided by the legislation of the Republic of Uzbekistan).

7.1.5 The Company protects the interests of the Employees and guarantees that it will not allow acts of harassment, including dismissal, demotion, discrimination, harassment, against Employees who in good faith reported suspicious behavior or possible violation of anti-corruption principles and requirements of this Policy by another Employee of the Company.

7.1.6 Providing deliberately false information, perjury or slander is considered a violation of this Policy and an example of unethical behavior, and the Employee who provided such a message may be held liable in accordance with the legislation of the Republic of Uzbekistan and the internal regulations of the Company.

## **8 CONSULTING EMPLOYEES**

8.1.1 If the Employees have any questions related to the requirements of the Applicable anti-corruption legislation, the provisions of this Policy or other anti-corruption measures and procedures of the Company, they can seek advice from their immediate supervisor and / or the Compliance Service.

8.1.2 The Compliance Service provides consulting in the following order:

- By e-mail when sending a question to the e-mail address: anticorruption@uks.uz;
- By phone during working hours: + 99781407448
- In person: office no. 315.

## **9 PROCEDURE FOR MAKING CHANGES**

9.1.1 This Policy is an internal normative document of permanent effect and comes into force from the moment it is approved by the order of the Chairman of the Management Board of the Company and is valid until it is canceled or a new version is approved.

9.1.2 This Policy is subject to revision and adjustment in the following cases:

- when changing the legislation of the Republic of Uzbekistan and / or leading international practices in the field of combating corruption, which entail the need to revise existing anti-corruption policies and procedures;
- in case of revealing ineffective anti-corruption measures and procedures and, if necessary, improving the complex of measures aimed at preventing and combating corruption in the activities of the Company;
- when changing the organizational structure of the Company or the specifics of its activities, etc.

9.1.3 In order to control the need to amend this Policy, the Head of the Compliance Service and the Head of the Legal Department of the Company review this Policy at least once a year for compliance with the legislation of the Republic of Uzbekistan and leading international practices in the field of combating corruption, as well as the activities of the Company, and if necessary, prepare a draft of a new version of the Policy, which is submitted for consideration by the Management Board of the Company.

9.1.4 All changes and additions to this Policy are introduced by the order of the Chairman of the Management Board of the Company.