



«OLMALIQ KMK» AKSYADORLIK JAMIYATI
AXBOROT XIZMATI

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№ 00607

On measures to ensure effective implementation of the legislation of the Republic of Uzbekistan “On Conflict of Interest” within Almalyk MMC JSC

In the central (executive) apparatus of Almalyk MMC JSC and its structural enterprises (hereinafter — the Combine), for the purpose of ensuring effective implementation of Order No. 3569 of the Director of the Anti-Corruption Agency of the Republic of Uzbekistan dated November 5, 2024 “On approval of standard forms of notification of existing conflict of interest, declarations of potential conflict of interest and the register for recording conflicts of interest”, ensuring unconditional observance of the rights and legitimate interests of the employees of the Combine, as well as introducing, on a systematic basis, legal mechanisms aimed at preventing conflicts of interest within the Combine, **I hereby order:**

1. To accept for guidance and execution Order No. 3569 of the Director of the Anti-Corruption Agency of the Republic of Uzbekistan dated November 5, 2024 “On approval of standard forms of notification of existing conflict of interest, declarations of potential conflict of interest and the register for recording conflicts of interest” (hereinafter — the Order).

2. Deputy Chairpersons of the Management Board, heads of central administrative divisions, structural enterprises and project offices (regardless of their organizational and legal form, subordination and accountability), in the activities of the areas, directions, enterprises, plants, factories, workshops, laboratories, departments, administrations, divisions, services, bureaus, all types of project offices, directorates and other structures under their supervision (hereinafter — central administrative divisions and structural enterprises), shall ensure effective implementation of the rules, requirements and mechanisms established by the Law of the Republic of Uzbekistan “On Conflict of Interest” No. ORQ-931 (hereinafter — the Law), Resolution of the President of the Republic of Uzbekistan No. PQ-210 (hereinafter — the Resolution) and this Order, ensure coverage of all managerial and engineering-technical employees, including foreign citizens (including foreign specialists), while ensuring protection of their rights and legitimate interests, as well as conducting necessary explanatory and awareness activities and organizing this work on a systematic basis, assigning personal responsibility for this work to the above-mentioned persons.

3. For the purpose of ensuring execution of this Order and organizing work on a systematic basis, to approve the composition of the Coordination Commission of the Combine (hereinafter — the Coordination Commission) in accordance with the Annex, under the chairmanship of the Deputy Chairman of the Management Board for Personnel and Social Issues — Chairman of the Ethics Commission S.B. Shermatov, with participation (by agreement) of the Chairman of the Trade Union Council of Almalyk MMC JSC A.Dj. Khaydarov, the Deputy Chairman of the

Management Board for Security D.A. Kayumov, and the Head of the Compliance Department Sh.Kh. Jurayev.

4. The Coordination Commission shall be designated as responsible for ensuring that all managers, executors and responsible persons at all levels of the Combine, including foreign citizens (foreign specialists), regardless of their position and citizenship, complete the notification and declaration forms approved by the Agency Order within the time limits established by legislation, in full, with high-quality and accurate information, as well as for maintaining the register, and for exercising systematic control, monitoring and application of enforcement measures on a collegial basis.

5. Deputy Chairpersons of the Management Board, with involvement of heads of all subordinate divisions and structural enterprises within their respective areas, shall ensure completion of notifications, declarations and mandatory formation of register reports provided for in the annexes to Order No. 3569 approved by the Agency, and submission of the reports approved by the head of the relevant structure to the Head of the Human Resources (HR) Department of the Combine (Sh. Dusimbetov) in the manner and within the time limits established by legislation.

6. The Head of the Human Resources (HR) Department (Sh. Dusimbetov) shall ensure collection of submitted notifications, declarations and register reports from central administrative divisions, structural enterprises and project offices, verification of compliance of the submitted reports with the forms established by Order No. 3569, as well as analysis and verification of completeness and accuracy of the data included in the reports, systematization of the reports by divisions and employees, and submission of consolidated materials to the Compliance Department.

7. The Compliance Department shall ensure substantive analysis of notifications, declarations and registers, re-verification of the data contained therein, request and obtain additional information from relevant divisions and officials where necessary, and, in case of confirmation of conflict of interest situations, ensure submission of such cases to the Ethics Commission of the Combine for consideration and taking measures to eliminate them.

8. The Compliance Department shall be designated as responsible for formation, consolidation and submission of the Combine's reports on conflicts of interest upon request of authorized state bodies. At the same time, responsibility for completeness and accuracy of the primary information, data and reports shall be assigned to the respective employee and his/her immediate supervisor.

9. The Chairman of the Ethics Commission of the Combine (S.B. Shermatov) shall be designated as responsible for submission of materials to the authorized state body — the Anti-Corruption Agency of the Republic of Uzbekistan — for application of administrative liability measures in respect of employees, including foreign citizens/foreign specialists (expats, relocated employees and migrant workers), who failed to submit notifications, declarations and the register within the time limits established by law, evade submission, provide false information, complete documents in non-compliance with established forms, conceal conflict of interest situations or otherwise fail to comply with the requirements of conflict of interest legislation.

10. The Deputy Chairman of the Management Board for Personnel and Social Issues — Chairman of the Ethics Commission of the Combine S.B. Shermatov, together with the Chairman of the Trade Union Council of Almalyk MMC JSC A.Dj. Khaydarov (by agreement), the Head of the Compliance Department Sh.Kh. Jurayev, the Head of the Legal Department S.K. Kasimov, the Head of the Human Resources (HR) Department Sh.I. Dusimbetov, and the Head of the Labor

Remuneration and Incentives Department A.M. Kambarov, shall ensure, within one (1) month, inclusion into all previously concluded and newly concluded employment contracts with employees of the central (executive) apparatus, structural enterprises and project offices, including foreign citizens/foreign specialists (expats, relocated employees and migrant workers), as well as into job (position/worker) descriptions, provisions предусматривающих обязанности работников по заполнению уведомлений, деклараций и ведению реестра в соответствии с Законом, Постановлением и формами, утвержденными приложением к Order No. 3569, and ensure familiarization of employees with these provisions against their personal signature.

11. Actions of all managers, executors and responsible persons at all levels of the Combine, including foreign citizens/foreign specialists, consisting in evasion from completion and submission of notification and declaration forms related to conflicts of interest, refusal to maintain the register, failure to comply with deadlines for completion and submission of notifications and declarations, submission of false information without valid reason or intentionally, concealment of existing (real) and potential conflicts of interest, shall be regarded as violations of conflict of interest legislation, and such persons shall be deemed officially warned about the application of sanctions предусмотренных статьей 193⁴ Кодекса об административной ответственности “Failure to comply with conflict of interest legislation”.

12. With respect to employees evading completion and submission of notification and declaration forms, refusing to maintain the register, failing to comply with legally established deadlines or attempting to submit false information without valid reason or intentionally, disciplinary measures shall be applied in accordance with the Labor Code on the basis of a joint official memorandum of the Human Resources (HR) Department and the Compliance Department, in agreement with the Chairman of the Trade Union Council A.Dj. Khaydarov, by the Ethics Commission of the Combine or the Employer, for failure to fulfill obligations предусмотренных трудовым договором либо должностной инструкцией.

13. It shall be taken into account that work on elimination of conflict of interest situations within the Combine is carried out in accordance with Order No. 001228 of Almalyk MMC JSC dated October 24, 2022 by the Ethics Commission of the Combine (S.B. Shermatov), in agreement with the Chairman of the Trade Union Council A.Dj. Khaydarov, together with the Human Resources (HR) Department (Sh.I. Dusimbetov), the Compliance Department (Sh.Kh. Jurayev) and the Legal Department (S.K. Kasimov).

14. Acting Head of the Digitalization Department V. Irismetov shall, within one month, analyze and assess compliance of the Combine’s information systems, databases, trade and procurement platforms and other software with the requirements established by the Law, the Resolution and this Order, and, if necessary, ensure their improvement, including creation of a digitalized system providing technical capability for completion of conflict of interest declarations, completion and submission of notification forms, maintenance of the register, formation, consolidation and submission of conflict of interest reports, verification and analysis of submitted reports and data, as well as ensure digitalization of all procedures and processes related to conflict of interest management.

15. Deputy Chairpersons of the Management Board, heads of all central administrative divisions of the Combine and heads of structural enterprises, including project offices and directorates (regardless of their organizational and legal form, subordination and accountability), shall be designated as personally responsible for full, effective and systematic organization of execution of this Order within the areas, divisions, enterprises and subordinate employees under their supervision.

16. Acting Head of the Office Manager Service N. Asrayeva shall ensure prompt delivery of copies of this Order to the Deputy Chairpersons of the Management Board, all central administrative divisions of the Combine and heads of structural enterprises, including project offices and directorates (regardless of their organizational and legal form, subordination and accountability).

17. The Deputy Chairman of the Management Board for Personnel and Social Issues — Chairman of the Ethics Commission S. Shermatov, the Deputy Chairman of the Management Board for Security D. Kayumov, and the Head of the Compliance Department of Almalyk MMC JSC Sh. Jurayev shall be designated as responsible for organizing effective execution of this Order.

18. Control over execution of this Order shall remain with me.

Chairman of the Management Board

A. Khursanov

COMPOSITION
of the Coordination Commission for managing notifications of existing conflicts of interest, declarations of potential conflicts of interest, and the conflict of interest register at Almalyk MMC JSC

No.	Full Name	Role in Commission	Position
1	Said Bakhtiyarovich Shermatov	Chairman	Deputy Chairman of the Board for HR and Social Affairs – Chairman of the Ethics Commission
2	Abdurashid Jayanakovich Khaydarov (by agreement)	Deputy Chairman	Chairman of the Trade Union Council
3	Daniyar Abrarovich Kayumov	Deputy Chairman	Deputy Chairman of the Board for Security
4	Gulnora Barkinovna Turanova	Secretary	HR Department employee
5	Kamol Baxodirovich Ismayilov	Member	Deputy Chairman of the Board for Commerce, Procurement and Localization
6	Valiyor Zakirjanovich Irismetov	Member	Director of Digitalization Department
7	Shukhrat Kholbayevich Jurayev	Member	Head of Compliance Department
8	Sanjar Kadirovich Kasimov	Member	Head of Legal Department
9	Shavkat Ibragimovich Dusimbetov	Member	Head of HR Department
10	Abror Bakhtiyarovich Kamilov	Member	Head of Unit for Control and Coordination of Work with Appeals of Individuals and Legal Entities
11	Aydarbek Akhmetovich Akhmetov	Member	Head of Risk Management Unit
12	Pavel Leonidovich Kim	Member	Head of Internal Audit
13	Azamat Abdishukurovich Mavlanov	Member	Chairman of the Youth Union
14	Bakhodir Bakhtiyarovich Yuldashev	Member	Head of Logistics and Supply Department
15	Kamola Rakhimjonovna Umaraliyeva	Member	Advisor to the Chairman on Spiritual and Educational Affairs and Compliance with State Language Legislation
16	Ilkhom Izzatullayevich Abdullayev	Member	Head of Social Affairs Department
17	Shakhista Khasanovna Nazarova	Member	Head of Investor Relations and Corporate Affairs
18	Umida Makhkamovna Karshibayeva	Member	Head of Information Service
19	Daniyar Dilmuratovich Karimov	Member	Director of Training Center

Note:

In case of reassignment or change of position of the Chairman or any member of the Commission, their duties shall be performed by the person appointed to the respective position or acting in that capacity.