

**REGULATIONS**  
**on the procedure for compiling and**  
**submitting report on the state of the**  
**anti-corruption system at**  
**JSC “Almalyk MMC”**

1. This Regulation determines the procedure for generating reports on the functioning of the anti-corruption system, as well as on the implementation of anti-corruption measures in the executive office and structural divisions of JSC Almalyk MMC (hereinafter referred to as the Company).

2. Responsibility for the formation and submission of consolidated reports (hereinafter referred to as the Reports) on the issues of the anti-corruption system and the development of the anti-corruption system in the Company rests with the heads of the Compliance Control Service (hereinafter referred to as the Service), as well as subdivisions of the executive office and structural subdivisions.

3. Responsibility for the preparation and submission of reports in the subdivisions of the executive office of the Company (department, management, department, service, sector, bureau, office, etc.), as well as in structural subdivisions (enterprises, workshops, factories, etc.) are assigned to a responsible employee (hereinafter referred to as the Compliance Officer/Compliance Ambassador/Compliance Coordinator), who is responsible for internal anti-corruption control in departments and enterprises.

## **Chapter II. Types of reports and frequency of their preparation**

4. In subdivisions of the executive apparatus (department, department, department, service, sector, bureau, office, etc.) and structural subdivisions of the Company, the following types and forms of reporting are created:

a) a report on the functioning of the Company, including the state of the anti-corruption program of the mill or the implementation of the measures provided for by the road map, is compiled by the internal control structures on a quarterly basis in accordance with the procedure established by Chapter 3 of this Regulation;

b) a report on the implementation of planned activities within the framework of the state anti-corruption program is compiled quarterly by internal control structures in the manner prescribed by Chapter 4 of this Regulation;

5. The report is regularly drawn up in accordance with the procedure and terms established by this Regulation, regardless of the state of the anti-corruption system at the plant, as well as whether or not anti-corruption measures were taken during the reporting period.

6. No report is prepared for the fourth quarter of the year; on the contrary, a generalized consolidated annual report is prepared.

7. Quarterly and annual reports are submitted to the chairman of the board of the Company, the Supervisory Board of the Company, as well as other interested state bodies of the authorized state body for combating corruption.

8. Quarterly and annual summary reports of the Company are formed by the Compliance Control Service of the executive office on the basis of reports compiled by departments of the executive office and all structural divisions (enterprises, workshops, factories, etc.), no later than the 15th (fifteenth) day of the month following for the reporting period, the Agency of the Republic of Uzbekistan for Combating Corruption (hereinafter referred to as the Agency) is provided with a summary report of the Company based on the results of each quarter.

9. General information in the quarterly and annual summary report of the Company is published on the official website of the Company in the Internet. This information is being prepared by the Mill's Compliance Control Service. The Information (Press) Service of the Company and the Department of Information Technologies, together with other divisions, ensure the immediate publication of reports submitted by the Service (no later than the tenth day of the month following the reporting period).

### **Chapter III. The procedure for generating a report on the functioning of the anti-corruption system**

10. A report on the functioning of the anti-corruption system in the plant is compiled in order to monitor and control the anti-corruption system, as well as to monitor the status of the implementation of anti-corruption programs, measures, a roadmap and other measures established in the plant system.

11. Such a report is compiled by the Compliance Control Service on a quarterly basis no later than the 10th (tenth) day of the month following the reporting period and submitted to the Chairman of the Management Board, the Supervisory Board and the state body authorized to combat corruption.

12. Formation of reports is carried out in the following order:

a) The compliance control service of the executive office, no later than the 2nd (second) day of the month following the reporting period, sends to the heads of all divisions of the executive office and structural divisions a notification of the submission of the report before the 5th (fifth) day of the month following the reporting period in the form, given in Appendix 1 to this regulation;

b) the report of the divisions of the executive office of the Company, as well as the reports of the structural divisions, respectively, are prepared by employees who are entrusted with the functions of Compliance Officer / Compliance Ambassador / Compliance Coordinator and within the established deadlines in the executive office and submitted to the Compliance Control Service for generalization / preparation of a consolidated report.

The consolidated report, summarized by the Compliance Control Service, is reviewed and approved by the Chairman of the Board;

In the event that the relevant measures to fulfill the instructions in any column/section of the report on anti-corruption activities are not carried out, the reasons for the non-fulfillment of measures in this/corresponding column/section are indicated.

c) the information included in the reports must be based on copies of relevant documents and other information, and documents confirming the information contained in the report must also be provided;

d) The compliance control service, in accordance with the form specified in Appendix 2 to this regulation, draws up a general / consolidated report on the functioning of the anti-corruption system at the plant, also additionally enters into it the information contained in the report, drawn up in the context of divisions of the executive office and structural subdivisions of the Company in accordance with the form in Appendix 1 to these Regulations.

The report should contain a summary of the main information, as well as proposals. The annual report should also reflect a comparative analysis with similar indicators compared to the same period last year.

13. When compiling a consolidated (general) report on the functioning of the anti-corruption system in the divisions of the executive office, as well as in the structural divisions of the Company, the Compliance Officer / Compliance Ambassador / Risk Manager has the right to request and receive the necessary documents, explanations and statistical data from employees of the relevant division.

14. The Compliance Control Service, before the 21st (twenty-first) day of the month following the reporting period, submits to the Chairman of the Board a Consolidated (general) report on the functioning of the anti-corruption system with a summary attached.

#### **Chapter IV. The procedure for generating a report on the status of implementation of planned activities by state anti-corruption programs**

15. A report on the implementation of planned activities within the framework of the state anti-corruption program is drawn up in accordance with the form given in Appendix 3 to this Regulation.

16. A report on the implementation of planned activities within the framework of the State Anti-Corruption Program is compiled by the Compliance Control Service simultaneously with a consolidated (general) report on the functioning of the anti-corruption system at the plant.

17. The report on the implementation of the planned activities within the framework of the State Anti-Corruption Program, after consideration and approval by the Chairman of the Board, is sent to the Supervisory Board, as well as to the authorized state body for combating corruption. General information in the report is provided on the official page of

the Company on the Internet by the Information (Press) Service together with other divisions and structural divisions of the Company.

## **Chapter V Final Provisions**

18. This Regulation is reviewed in case of amendments and additions to the legislative acts of the Republic of Uzbekistan, internal regulatory documents of the Company, as well as in case of changes in international best practice in the field of combating corruption.

The Compliance Control Service is responsible for making changes and additions to this Regulation.

19. All employees working in the plant and its structure are required to comply with the provisions and requirements of these Regulations.

Appendix 1  
to the Regulations on the Procedure for Compiling and  
Submitting Report on the State of the Anti-Corruption System  
in JSC Almalyk MMC

**Report on the functioning of the countermeasure system  
corruption in the divisions of the executive apparatus  
and structural subdivisions of Almalyk MMC JSC**

Name of subdivisions of the executive office and structural subdivision:	
<b>The employee who prepared the report (responsible for combating corruption):</b>	Full name, position, name of the structure, personnel number
<b>Reporting period:</b>	
<b>Date of report:</b>	

No.	Description of group of activities	Description of activities	Term for performing	Responsible persons	Sign of fulfillment	In case of non-fulfillment, the expected date of fulfillment	Completion approval, reasons for non-fulfillment

No.	Activities	Result
<b>I Policies and procedures</b>		
1.	Alignment (improvement/coordination) of internal regulatory documents	In the subdivisions of the executive office, as well as in the structural subdivisions of the Company, it is necessary to show internal regulatory documents (policies, regulations,

		standards, instructions, etc.) with procedures to combat corruption, etc.) or measures to reduce corruption risks brought into line for the reporting period (with amendments and additions).
2.	Development of internal regulations governing new anti-corruption procedures and measures to reduce corruption risks, as well as issues on anti-corruption risks in the context of risk-prone tasks and procedures.	It is necessary to show the developed and approved regulatory internal regulatory documents (policies, regulations, standards, instructions, etc.) in the field of combating corruption in the reporting period
<b>II Personal example</b>		
3.	Openly expressed attitude, speeches (speeches, interviews) of members of the board, heads and their deputies of divisions of the executive apparatus (department, administration, department, service, sector, bureau, office, etc.) and structural divisions (enterprise, shop, factory, etc.) in relation to corruption in internal events, media, social networks	In paragraphs 3-6, it is necessary to indicate the activities that openly demonstrate compliance with the requirements of the law by the members of the board, heads and their deputies of the divisions of the executive apparatus, as well as structural divisions, an unacceptable attitude towards corruption, positions and opinions on the importance of observing the control and anti-corruption procedures defined in the governing body. the structural unit itself.
4.	Distribution of internal communication on anti-corruption issues (on behalf of the heads and his deputies of the executive office and structural divisions of the Company).	
5.	The number of speeches by the chairman of the board, members of the board and other high-ranking managers about the work, plans and goals implemented in the field of combating corruption in the areas or areas they directly supervise in the media and social networks.	
<b>III Assessment of risks</b>		

6.	Carrying out an annual assessment of corruption risks in the divisions of the executive office and structural divisions of the Company.	Yes carried out / no not carried out (the reasons are indicated) \ in the process (it is indicated at what stage it is).
7.	Assessment of corruption risks and their levels (high, medium, low) in the subdivisions of the executive office and structural subdivisions of the Company, newly identified in the process of work during the reporting period.	<p>It is listed in which processes new corruption risks were identified, the degree of their danger. What corruption risks were reassessed, the new level, the reasons for the change in the assessment and proposals for reducing corruption risks.</p> <p>Attached is a map of corruption risks of divisions of the executive office and structural divisions of the Company.</p>
8.	Measures taken to manage corruption risks identified during the reporting period.	
9.	Number of identified corruption risks with high residual corruption risks.	The percentage of corruption risks with a high residual risk is indicated.
10.	The amount of residual bribery risk of identified bribery risks, reduced to medium and below.	It is necessary to indicate the percentage ratio of residual corruption risks to the total number of corruption risks reduced to medium and below.
<b>IV Implemented anti-corruption procedures</b>		
11.	Circumstances of the conflict of identified interests and measures taken in the divisions of the executive office and structural divisions of the Company	It is necessary to indicate the number of cases of conflict of interest identified in the departments and structural units of the Company's Executive Office or to attach the register of cases of conflict of interest.
12.	Annual declaration by employees of a conflict of interest.	It is necessary to indicate the percentage ratio of employees who have passed the annual procedures for declaring a conflict of interest, to the



		<p>total number of employees in the divisions of the executive office and structural divisions of the Company.</p> <p>It is necessary to indicate the annual percentage ratio of employees who have passed the procedures for declaring a conflict of interest, who are required to declare a conflict of interest, to the total number of employees in the divisions and structural divisions of the executive office of the Company.</p>
13.	Number of checks carried out on hired employees and candidates.	<p>It is necessary to indicate the number of employees hired for the reporting period in the divisions of the executive office and structural divisions of the Company, the number of checks of candidates for positions in the divisions and structural divisions of the executive apparatus of the Company. If the check was not carried out, a reason must be given.</p>
14.	Number of checks of counterparties conducted in the reporting period	<p>It is necessary to indicate the number of checks of counterparties conducted during the reporting period, the percentage of positive and negative conclusions based on the results of checks. If the counterparty was not checked, you must specify the reason.</p>
15.	Other implemented anti-corruption procedures	<p>If available, it is necessary to indicate other ongoing anti-corruption measures not listed in this section.</p>
<b>V Education and communication</b>		
16.	<p>Conducting anti-corruption trainings: for all employees;</p> <p>for tasks, positions, functions and divisions in which there is the greatest likelihood of exposure to corruption</p>	<p>Indicate the type and form of training, the number of trained personnel, including the number of managerial personnel, the level of their positions and the names of the departments in which they work.</p>

	offenses.	
17.	Carrying out trainings for newly recruited personnel of the divisions of the executive apparatus, as well as structural divisions of the Company.	Indicate new employees who have completed training (general, introductory) on anti-corruption issues as a percentage of the total number of new employees in the context of the training topic.
18.	Other activities related to raising the awareness of employees about the requirements of anti-corruption legislation and anti-corruption measures taken in the unit.	Specify the target group of event participants, their number (if possible), theme and type (for example, contests, quizzes, surveys, etc.). and his results.
19.	Information and handouts on the topic of anti-corruption standards, carried out by those responsible for combating corruption.	The number of messages and other handouts on the need to comply with anti-corruption requirements and procedures, including their correct interpretation and proper observance, is indicated.
20.	Other ways to form a culture of ethics-behavior of the workers of the Company in the service and in society, continuous (systematic) informing them about the anti-corruption system and the requirements of anti-corruption legislation.	For example, information posters and other materials in buildings, screensavers, images placed on the screens of work computers, notes, regular mailing of various announcements and messages in the field of combating corruption to mobile numbers of executive departments, as well as employees of structural divisions of the Company, mobile numbers of counterparties, messages in the field of combating corruption in both public and social networks of the Company.
21.	Carrying out joint anti-corruption activities with the participation of representatives of civil society (media, social networks) and contractors.	Indicate the number, name, nature and results of anti-corruption activities with the participation of representatives of civil society (mass media, representatives of social networks) and counterparties (for example, anti-corruption day, competition for work on the topic of combating corruption).

		The ratio of the state of inclusion of additional anti-corruption conditions in all business contracts of the Company to the total percentage of new counterparties.
<b>VI Reports of corrupt practices and offences. Measures applied</b>		
22.	Number of messages coming into communication channels for actions, including potential actions	Indicate the number of messages, including also the following data: date of receipt, communication channel through which the message was received, subject of the message, attachment of the corresponding report.
23.	The number of circumstances in which:  an internal audit has been carried out;  approved circumstances of violation of anti-corruption legislation (including those identified in the context of internal regulations and articles) were identified;  circumstances of violation of control and anti-corruption procedures defined in the unit (including in the context of internal regulatory documents) were identified;  found guilty.	Specify the number of circumstances for each item.
24.	Applied corrective action.	What corrective actions have been taken, including disciplinary actions, what deficiencies have been identified in the internal control system, and what measures have been proposed to improve control.
<b>VII. Monitoring and control</b>		
25.	Carrying out checks in the reporting period on the implementation of existing anti-corruption requirements, control	Verification activities carried out by persons responsible for combating corruption in the divisions of the

	measures and procedures	<p>executive office and structural divisions of the Company, including an indication of their number in the next section.</p> <p>Objects of verification (management, department);</p> <p>Subject of verification (for example, procurement, personnel, warehouse, accounting);</p> <p>Type of verification activities (audit, monitoring of risky transactions or procedures, etc.);</p> <p>The nature of the verification activities (scheduled, unscheduled).</p>
26.	Have the circumstances of the violation of control measures and procedures established in the unit (enterprise) been identified, and list the measures of influence applied to them?	<p>What violations were identified during the execution of the procedure or task (function)? Show the number of detected cases.</p> <p>What guidance has been provided to those performing the tasks and procedures? How are they formalized (for example, by order or other internal documents)?</p>

**Conclusions:** it is necessary to show the main results of the implementation of anti-corruption measures in the divisions of the executive office and structural divisions of the Company, give a general assessment of the state of the anti-corruption system, conduct a comparative analysis with the indicators of previous periods, if possible, indicate the reasons for achieving or not achieving satisfactory results.

Proposals for the further development of the anti-corruption system and a corrective action plan: it is necessary to indicate the main measures that will improve certain elements of accountability in the upcoming reporting period.

Appendix 2  
to the Regulations on the Procedure for Compiling and  
Submitting Report on the State of the Anti-Corruption System  
in JSC Almalyk MMC

**GENERAL REPORT**  
**on the functioning of the anti-corruption system in the divisions of the executive office,**  
**as well as structural divisions of Almalyk MMC JSC**  
**for \_\_\_\_ - quarter of 202\_\_\_\_**

**I. General information on the implementation of the program of anti-corruption measures by divisions of the executive office and structural divisions of Almalyk MMC JSC<sup>1</sup>**

It is necessary to indicate brief information on the implementation of anti-corruption activities by the divisions of the executive office and structural divisions of the Company, including the number of divisions that have implemented anti-corruption activities in the context of divisions of the executive apparatus, as well as structural divisions;

Subdivisions of the executive office, as well as structural subdivisions of the Company that did not implement anti-corruption activities, must also indicate in the annex to the report their name, unfulfilled activities and their main reasons in a short form.

**II Policies and Procedures**

It is necessary to indicate regulatory legal and internal regulatory documents (policies, regulations, standards, instructions, etc.) related to the anti-corruption sphere, regulated in the field of combating corruption and implemented in the context of the divisions of the executive office and structural divisions of the Company during the reporting period.

<sup>1</sup> In this section and further for each section of the report, the following should be indicated:

- In a consolidated (collective) form, general information for the reporting period is provided in the context of divisions of the executive apparatus, enterprises in the system. If necessary, individual divisions and enterprises, and data on them are indicated;
- If necessary, it is necessary to conduct a comparative analysis with the indicators of previous periods, the reasons for achieving / not achieving satisfactory results.

### **III. Assessment of risks**

Information on the performance of work on risk assessment by the divisions of the executive office and structural divisions of the Company, including the divisions of the executive apparatus of the Company that assessed corruption risks and updated the matrix of their corruption risks, should be indicated in the section of the executive apparatus, as well as the structural divisions of the Company;

An association that has not assessed corruption risks is indicated in the section of subdivisions of the executive office and structural subdivisions, and their names and reasons for not assessing corruption risks are briefly indicated in the appendix to the report;

In the process of assessment, newly identified corruption risks are indicated in the subdivisions of the executive office, as well as structural subdivisions of the Company. Corruption detected during the reporting period, proposed and implemented risk management measures are also recorded;

The ratio of corruption risks by category (high, medium, low) is indicated in the sections of the executive office, as well as the structural divisions of the Company;

It is necessary to indicate the measures proposed to reduce residual corruption risks that are high for the plant, as well as the indicated corruption risks (if any) in the context of the divisions of the executive office and structural divisions of the Company.

### **IV. Implemented anti-corruption procedures** **Regulation of conflicts of interest.**

Conflict of interest, indicates the number of declared and settled cases, including in the process of hiring or annual declaration (if any)<sup>2</sup>, by divisions of the executive apparatus, as well as structural divisions;

the ratio of employees who have passed the annual procedures for declaring a conflict of interest as a percentage of the total number of employees is noted, as well as cases of declared and regulated conflicts of interest in the context of divisions of the executive office and structural divisions of the Company;

<sup>2</sup> Information is supplemented only when declaring a conflict of interest during the reporting period.

it is necessary to provide analytical information in the context of departments and enterprises that have not fulfilled the indicators in relation to the annually declared planned conflict of interest by departments of the executive office and structural divisions of the Company (for example, the declaration of a conflict of interest should be carried out by managers of all levels and units, and in fact this instruction has been fulfilled only 50% by executives)<sup>3</sup>;

In the context of divisions of the executive office and structural enterprises of the Company, it is necessary to provide analytical information on the conflict of interest identified in the plant and the measures taken, including the total number and by category (for example, in procurement procedures, as a result of direct subordination in the case, etc.).

#### **Status of inclusion of anti-corruption rules in all types of business contracts of the Company**

Indicate the number and reasons for the rejection of the inclusion of anti-corruption rules in all business contracts of the Company (the percentage of contracts in which the rules are included in the contracts concluded during the reporting period is indicated), including the provision of analytical and statistical data in terms of divisions of the executive office and structural divisions of the Company, also bringing analytical and statistical data in the context of counterparties, rejecting the inclusion of anti-corruption rules in contracts;

Indicate analytical and statistical data on the termination of the contract due to violation of anti-corruption rules by counterparties (business partners) of the divisions of the executive office and structural divisions of the Company

#### **Status of verification of counterparties of JSC Almalyk MMC**

The number of inspections carried out in relation to counterparties during the reporting period, the percentage of positive and negative conclusions are indicated by divisions of the executive office and structural divisions of the Company.

#### **The status of verification of candidates who have expressed a desire to work in the executive office or structural divisions of JSC Almalyk MMC**

The number of checks in the context of divisions of the executive apparatus, as well as structural divisions of the Company, conducted on candidates who expressed a desire to get a job at the plant or any of its divisions, is indicated.

<sup>3</sup> Information is supplemented exclusively in the annual report.

## **V. Education and communication**

The results of training on combating corruption in the plant are indicated in the section of the divisions of the executive office and structural divisions of the Company: the ratio of trained personnel as a percentage of the total number of employees, the form of training (direct/online/offline);

Information on anti-corruption skills with a low level of training is given in the section of the divisions of the executive office and structural divisions of the Company (compared to the planned indicators);

The types and number of messages in the plant and its structural divisions on issues of combating corruption are indicated in the context of divisions of the executive apparatus and structural divisions of the Company (for example, conducting surveys on handouts, combating corruption);

This Section of the reporting form can also highlight individual events of a wide range (republican level or international format) held at the Mill.

## **VI Reports of corrupt practices and offenses**

Messages received through communication channels about corrupt practices involving the employees of the Company, conflicts of interest, rules of corporate ethics and conduct, as well as other issues related to corruption violations, are indicated in the context of the divisions of the executive apparatus, structural divisions;

received in the section of career tasks and procedures (for example, in the procurement process, in the section of procedures related to recruitment);

the received analytical information is given in the context of job duties and procedures (for example, in the procurement process, in the context of procedures related to the recruitment of personnel);

analytical information on received messages is given in the context of offenses (for example, corruption, conflict of interest, violation of approval procedures, etc.);

Analytical information on received messages is given in the context of communication channels (for example, a helpline, direct notification, and others).

## **VII. Monitoring and control**

In the context of divisions of the executive office, as well as structural enterprises of the Company, during the reporting period, (scheduled, unscheduled) analytical information on existing (current) anti-corruption requirements, control measures and the status of procedures, including analytical information on the frequency and nature of tasks and procedures, is indicated, in accordance with whom the checks were carried out;



in the context of the divisions of the executive office, as well as the structural division of the Company, the number of divisions in which inspections were not carried out is separately indicated, the appendix briefly notes the main reasons for not conducting inspections;

General information on the results of the inspections carried out is indicated, including the percentage of positive and negative conclusions. If there are violations, a link to section VIII of this report is provided.

### **VIII. Identified violations and applied measures of influence**

In the context of the divisions of the executive apparatus, as well as the structural division of the Company, analytical information is indicated on the violation of the requirements for combating corruption in the divisions of the executive apparatus, as well as the structural divisions of the Company, including:

- the total number of violations;

- structure by sources of information about offenses ("helpline", direct notification, results of monitoring and control, etc.);

- The structure of violations in the context of tasks, functions, as well as procedures (purchases, personnel issues, etc.) provided for by the internal regulatory documents of the Company;

- indicate analytical information on the measures of influence taken in the divisions of the executive apparatus, also in the structural divisions of the Company in the context of the divisions of the executive apparatus, also in the structural divisions, including:

  - taking or not taking action on the number of general preventive measures taken and violations detected;

  - analytical information on the types of measures of influence (bringing the perpetrators to justice), including in the context of the types of responsibility (the number of proposals made to bring to disciplinary, administrative or criminal liability);

  - a proposal is indicated for making changes and additions to the documents and internal regulatory documents that determine the production processes of the divisions of the executive apparatus, as well as the structural divisions of the Company, including the introduction of any measures to prevent offenses, as well as what measures were introduced in the reporting period.

## **IX. Conclusions**

In the context of the divisions of the executive office of the Company, as well as structural divisions, the main results of the implementation of anti-corruption measures are indicated, a general assessment of the state of the anti-corruption system is given.

If necessary, a comparative analysis is carried out with indicators for previous periods, the reasons for achieving or not achieving satisfactory results are recorded.

## **X. Proposals and action plan for further development of the anti-corruption system**

The main measures are indicated that allow further improvement and improvement of individual indicators of the anti-corruption system in the divisions of the executive office, as well as in the structural divisions of Almyk MMC JSC in the context of divisions of the executive apparatus, as well as structural divisions in the next reporting period.

Appendix 3  
to the Regulations on the Procedure for Compiling and  
Submitting Report on the State of the Anti-Corruption System  
in JSC Almalyk MMC

**REPORT**  
**on the status of the implementation of measures planned by the State Anti-Corruption**  
**Program**

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