

Anti-corruption policy of JSC “Almalyk MMC”

Chapter 1. General provisions

1. Anti-corruption Policy of JSC “Almalyk Mining and Metallurgical Company” (hereinafter referred to as the Policy) reflects the provision of raising the legal awareness and culture of the Company's employees in order to introduce and develop the comprehensive system for combating corruption that meets the requirements of the international **ISO 37001:2016** standard, in particular the composition of anti-corruption, early detection of corruption situations and elimination of their causes and conditions, prevention of corruption actions, the formation of an intolerant attitude to corruption, the organization of preventive measures to combat corruption within the Company, ensuring the execution of documents in the field of anti-corruption, as well as the principle of unconditional responsibility for committing corruption offenses.

2. The Policy has been developed in accordance with the requirements of the international ISO 37001:2016 standard "Anti-corruption management systems. Requirements and recommendations for application", recommendations of international organizations on combating corruption, as well as the requirements of the legislation of the Republic of Uzbekistan based on international best practices.

3. The Policy is the important internal regulatory document defining the basic principles and requirements for the prevention and elimination of corruption offenses in the activities of the executive office and structural divisions of the Joint Stock Company “Almalyk Mining and Metallurgical Company” (hereinafter referred to as the Company), and serves as a program of measures implemented by the executive office and structural divisions of the Company.

Along with this, each link in the executive office and structure of the Company should adopt this Policy based on the specific characteristics of the type, scope and direction of its activities, and at the stage of implementation and implementation of control measures and procedures, it is considered appropriate to take into account corruption risks specific to a particular unit, the experience accumulated in it, the available capabilities and resources.

4. The main objectives of combating corruption in the Company and its structural divisions are:

achieving radical elimination of corruption at the Company and its structure;

further increase of the level of legal awareness and legal culture of the Company's employees and its structure;

formation of absolutely intolerant attitude to any forms and phenomena of corruption at the Company and in its structure;

recognition of the priority of measures aimed at preventing corruption in the activities of the Company and its structure, in the fight against corruption in all sectors and directions, as well as the consistent implementation of such measures at the Company and in its structure;

The purpose of the Company and its structure is timely detection of corruption offenses, their elimination, elimination of their consequences, causes, conditions and factors

leading to corruption, and ensuring the principle of inevitability of responsibility for committing corruption offenses without any exceptions.

5. This Policy is the main document defining the basic requirements and principles aimed at the prevention and elimination of corruption offenses in the activities of the Company and its structural units, in order to achieve the goals specified in paragraph 4 of this Policy as the most important internal regulatory document of the Company.

6. The requirements of this Policy apply to all employees of all levels and levels who are in labor relations with the Company and its structure, regardless of their position, position, duties and functions, including members of the Management Board of the Company, heads of the executive department, heads of structural divisions, officials and employees and employees.

7. Every employee who is re-employed at the Company and its subdivision assumes the obligation and responsibility to strictly comply with the rules and requirements of this Policy from the date of familiarization with its rules and requirements under the signature.

8. For the purposes of this Policy, the following basic concepts and terms are used:

associated persons – persons participating in the authorized capital of other commercial organizations together with the Company and its employees (except for cases when they own less than five percent of the block of shares of Plants whose shares are in public circulation on the Republican Stock Exchange);

hospitality in the process of work – to establish cooperation with the Company and its employees in order to obtain direct or indirect benefits from their official position and (or) the position they hold and (or) third parties to pay for the employee's meals, travel, accommodation and other personal expenses to maintain such cooperation is expressed in the coverage;

conscientious reporting of violations of anti-corruption requirements – the appeal of the employee of the Company and its subdivision about the commission of a corruption offense (or an attempt to commit it) through authorized communication channels with confirmation of its validity;

counterparty – any legal entity or individual (individual entrepreneur) entering into contractual relations (with the exception of labor relations) with the Association and its participants;

corruption – the illegal use by a person of his position or official position in order to obtain material or non-material benefits in his personal interests or the interests of other persons, as well as the illegal presentation of such a position;

corrupt actions – receiving or demanding a bribe, that is, money, securities, other property, property services, other property rights, directly or indirectly, personally or through third parties, for the actions or inaction (actions) of an employee in the interests of a bribe giving, offering, promising and giving, as well as mediation in giving and (or) receiving a bribe, receiving payments to simplify formalities, receiving a bribe by an employee or illegally using his official position (position) for other illegal purposes;

corruption offense – an act (action or omission) that has corruption characteristics, for the commission of which responsibility is provided for by legal acts;

anti-corruption structure – the current legislation and a set of measures to eliminate corruption violations of internal regulatory documents, to ensure a high level of professional and service ethics of employees of the Company and its structure;

corruption risk – the possibility and risk of committing corrupt actions by employees of the Company and its structure or by third parties on behalf of the Company and its constituent units and (or) on behalf of departments in the executive apparatus and (or) pursuing their interests;

additional condition for combating corruption – a set of special rules that must be included in all contracts concluded by the Company and its structural divisions, and these rules oblige the Parties to strictly comply with the rules and requirements of the anti-corruption legislation of the Republic of Uzbekistan in the process of concluding, executing, amending and terminating business contracts.

conflict of interests – situations in which the direct or indirect personal interest of a person holding a certain position in the Company and its structure affects or may have such an impact on the objective and impartial performance of labor (official) duties, and they are recognized as a conflict of interests;

fees for simplification of formalities – funds, property, property rights, services and other material or intangible benefits provided illegally to ensure or accelerate the execution of procedures, the commission of actions not provided for by the relevant legislation, norms and rules;

personal interest of the employee – the possibility of obtaining personal benefits in the form of cash, tangible or intangible assets, other property, wealth and benefits that may affect the proper performance by an employee of his official or official duties on the part of his close relatives or persons related to the employee, in the performance of his official duties by a worker of the Company and structural divisions (personal, social, financial, political and other commercial or non-commercial interests);

employee (employees) – any individual who has entered into an employment relationship with the executive office of the Company and its structural divisions, including members of the Management Board of the Company;

patronage – patronage of the Company and its employees by another employee of a higher position in the form of patronage, creation of favorable working conditions;

close relatives – parents, biological and step brothers and sisters, husband (wife), children, including those adopted, grandparents and grandchildren.

Chapter 2. Basic principles of countering corruption

9. The Company and its structural subdivisions implement anti-corruption policy based on the following principles:

legality – measures to combat corruption in the Company and its subdivisions, considering the requirements of the legislation of the Republic of Uzbekistan, international best practices and practices recognized in the world experience in combating corruption in state and economic management bodies, and in accordance with internal regulatory documents of the Company increased;

absolute intolerance to corruption – the Company and its constituent units have absolutely intolerant attitude to any forms and manifestations of corruption in all spheres and directions of their activities. Direct or indirect participation in any activity that may create a risk of corruption for employees of the Company and all levels and levels of its structure is strictly prohibited;

openness and transparency – the Company and its employees, contractors and the general public are regularly informed about the measures taken and implemented in the field of combating corruption and their results;

Preventive, systematic and interrelated measures carried out to counteract corruption – priority is given to the implementation of preventive measures aimed at eliminating the conditions and factors leading to the emergence of corruption actions and corruption risks in the Company and its structure. Measures aimed at combating corruption are systematically implemented in all areas of the Company's activities and its constituent units. Anti-corruption measures and procedures commensurate with the level of risks identified in the Company are integrated into a single centralized anti-corruption system integrated into all functions and directions of the Company and its divisions;

responsibility for the commission of corruption offenses – the Company and its employees who have committed corruption offenses, regardless of their position and position, are responsible in accordance with the internal regulatory documents of the Company and the current legislation;

using the achievements of technical development – when creating a system for combating corruption at the Company and in its structural divisions, the latest achievements of the development of science, including integration information and communication systems, are widely used.

direct appeal to the management – every employee of the Company and its structural subdivision has the right to apply directly to the Head of the Service or the Chairman of the Management Board with a request to take measures established by law, if he has reliable and substantiated information about the commission of corruption offenses.

mutual cooperation with representatives of civil society – the heads and officials of the Company and its constituent units cooperate with leading representatives of civil society in order to ensure independent control of the activities of the Company and its structure based on the principles of openness, transparency, honesty and impartiality in the performance of their tasks and functions;

continuous improvement of the anti-corruption structure - based on the results of monitoring and control of the anti-corruption structure and elimination of corruption risks, the effectiveness of the anti-corruption structure of the Company and its structure is regularly increased.

Chapter 3. Elements of the anti-corruption structure

10. Based on the principle of "absolute intolerance" to corruption, all employees of the Company and its structure are prohibited from participating in any actions related to corruption, i.e. acting in the interests of the bribe giver, as well as taking bribes directly or indirectly, personally or through third parties, that is, extortion of money, securities, other property, services in the form of property, extortion, promise and giving of bribes, mediation in giving and (or) receiving bribes, receiving payments for simplification of formalities, illegal use of official position is strictly prohibited.

11. The main elements of the anti-corruption structure at the Company and in its structure are:

a) the presence of a set of existing and implemented basic internal regulatory documents on combating corruption, as well as the presence of an internal control structure against corruption, that is, the creation and implementation of an organizational, legal and institutional framework for the structure of the fight against corruption in the Company and its divisions:

adoption and implementation of this Policy at the Company;

adoption and implementation of the rules of "Service ethics" of employees of the Company and its structure;

adoption and implementation of the Regulation "On Conflict of Interest Management" at the Company and in its structure;

The Company has created the "Internal Control structure for combating corruption" and its activities have been established, that is, when implementing anti-corruption tasks, this structure is quite independent and important (administrative, financial, control, technical, organizational and legal, etc.) with resources, direct and direct accountability to the first head of the Board of the Company, the activities of the Service It consists of the principles and requirements established in the Regulations approved by the Chairman of the Company.

b) "the attitude of superior to subordinate" – standard of high-level leadership:

the heads of the management board, the executive office of the Company and departments in its structure, in their relations with subordinate employees, citizens, individuals/legal entities, show a personal example of high behavior, respect for the rule of law, priority of rights, freedom and legitimate interests of citizens, patriotism, justice, honesty, objectivity and dedication and loyalty, devotion to the interests of the state, the Company and its structures, as well as the prevention of conflicts of interest.

The Chairman of the Management Board, Deputy Chairmen of the Management Board, heads of structural divisions of the Company show an example of leadership in creating and implementing an effective anti-corruption system through the following:

as the first – to implement effective anti-corruption measures and procedures in the functions (areas) of the Company's activities that have corruption risks, including to provide practical support to the activities of the Service by monitoring the development, approval,

implementation and advanced and systematized program/ roadmap, introducing it into daily work and regularly monitoring its implementation, the implementation of anti-corruption measures in the headed in a structural division or department;

within the framework of their professional powers and official duties, tasks and functions, the Company and its employees must strictly comply with the norms of legislation and adopted internal regulatory documents on the fight against corruption, forming an intolerant and uncompromising attitude to all forms and manifestations of corruption and high behavior demonstrate an example of moral behavior and personal example;

strict compliance with the state principles and requirements in the performance of official duties;

perform their official duties in good faith and at a high professional level;

timely and high-quality execution of decisions (instructions) adopted (given) by the above-mentioned state bodies and officials within their powers;

carry out its activities within the powers of the position provided for by regulatory legal acts, the Charter of the Company, this Policy and other internal regulatory documents;

not to favor and not to allow the manifestation of the advantages of any persons, groups or organizations, to be independent of their influence, to take into account the rights, duties and legitimate interests of the Company's employees and its members, not to allow the infringement of their rights;

when selecting and appointing personnel in the system of the Company and its structure, negative situations should not be allowed, such as selection and appointment on the basis of kinship, cronyism and localism or personal loyalty, clanism, localism, favoritism, nepotism, fraternity, and also other negative factors should be strictly prevented in the process of performing official and personal duties.

strict observance of restrictions and prohibitions established by regulatory legal acts and internal regulatory documents, unquestioning performance of their official duties;

exclude the possibility of any influence on their official activities;

respect for the customs and traditions of all nations and peoples operating at the Company and its structural subdivisions, taking into account the cultural and other characteristics of various ethnic, social groups and confessions, promoting social stability, interethnic and interfaith harmony at the Company and its structural subdivisions;

refrain from behavior that may raise doubts about the conscientious performance of their duties, as well as avoid situations that may damage their reputation or the reputation and business reputation of the executive office of the Company and its subdivision;

not to use his official position for unlawful influence on the activities of state bodies, other organizations, their officials, as well as citizens;

At the Company and in its structure, they must comply with the established rules for providing messages and service information and relevant data.

c) identification and assessment of corruption risks:

The plant and its structural subdivisions, based on their functional features, organizational and legal structure, all areas and areas of their activities, identify, form a list and assess corruption risks that are characteristic of their official powers, when interacting with third parties, as well as taking into account other internal and external factors;

as part of the identification and assessment of corruption risks, all areas and areas of activity of the Company and its structures are analyzed in order to identify functions that are more susceptible to corruption risks, in which existing procedures and forms of control within the framework of anti-corruption control are systematically analyzed for their adequacy and proportionality to reduce the identified risks;

activities related to the identification and assessment of corruption risks are carried out by the Company and its structural subdivisions, if employees coordinating the fight against corruption are appointed, in which case they are carried out by these employees with the support, as well as under the direct control of the employees of the Service;

Since the Company and its structure have introduced the principle of “absolute intolerance” to any forms and manifestations of corruption, the management of the Company and heads of all levels and levels recognize the need to manage corruption risks, regardless of the possibility of corruption risks or the degree of influence of such risks;

A comprehensive assessment of corruption risks at the Company and its structure is carried out at least once a year. The results of the assessment of corruption risks are considered by the Chairman of the Board of the Company;

Measures to manage the identified risks and eliminate their main factors are reflected in the relevant activities, work plans or road maps of the Company and its divisions aimed at combating corruption.

d) persons and units responsible for combating corruption:

a special structural unit responsible for control was created - the Compliance Control Service (hereinafter referred to as the Service), which is responsible for establishing an effective anti-corruption system, organizing anti-corruption work and exercising control in this direction at the Mill and in its structure;

The Service is independent and has sufficient critical resources (administrative, financial, organizational and legal) in the implementation of anti-corruption tasks and reports directly to the Chairman of the Board of the Company and operates on the basis of the Regulations on the Service, approved by the Chairman of the Board of the Company;

To ensure effective and timely implementation, coordination and control of anti-corruption measures in structural divisions, certain positions (staff units) may be assigned the functions of coordinating anti-corruption activities based on the relevant order of the Chairman of the Board. The function of coordinating anti-corruption measures is assigned

to an employee who works in a position with a low risk of corruption, and who is also quite independent;

Employees coordinating anti-corruption work in the executive office of the Company and structural divisions take measures to eliminate corruption, at the same time cooperate with the Service within the framework of the assigned tasks and functions;

The plant and departments for work with the personnel of structural divisions in the manner and to the extent established by the legislation of the Republic of Uzbekistan, as well as in accordance with the Regulations on the management of conflicts of interest of JSC "Almalyk Mining and Metallurgical Company", are personally responsible for the systematic selection, analysis and updating of detailed information about employees of the Company, related persons, as well as close relatives of employees;

The Ethics Committee of the Company considers information about conflicts of interest among employees and (if the conflict of interest is not resolved) decides on its resolution or decides on the sufficiency or inadequacy of the measures taken to resolve the identified conflict of interest, as well as issues of compliance with the "Code of Service Ethics" on plant and its string subdivisions.

The Ethics Commission of the Company and its members, departments for work with personnel, when considering issues related to the management of conflicts of interest, JSC "Almalyk MMC" work in accordance with the rules and requirements of the Regulations "On the management of conflicts of interest".

e) measures and procedures aimed at minimizing identified corruption risks:

A comprehensive anti-corruption system will be introduced in the executive office and structural divisions, which will provide a common control environment, as well as separate procedures and control measures will be established to control certain areas of activity and functions with a high probability of corruption risks;

The effectiveness of control measures and procedures implemented within the system, including their proportionality to the level of identified corruption risks, rigor and accuracy for employees, as well as openness and transparency for representatives of civil society, are ensured by the executive branch. plant apparatus and structural subdivisions;

The actions taken, as well as control measures and procedures implemented to combat corruption, are reflected and confirmed by the internal regulatory documents of the Company in documents such as anti-corruption programs/work plans/road maps of the executive office of the Company and structural divisions.

f) informatization, communication and consultation:

In order to reduce corruption risks at the Company and in its structure, as well as to inform the general public about the procedures, requirements, rules related to combating corruption, the results of the activities carried out are regularly published on the official website of the Company by the Information (press) service of the Company.

In order to inform employees and other interested parties about the procedure and requirements, explain to them the content of documents related to this area, the following measures are taken:

Continuous and systematic training of the Company's employees in short-term training courses on the basics of combating corruption at least once a year, including the mandatory familiarization of newly hired employees with the requirements of this Policy and other internal regulatory documents on organized anti-corruption training of employees in mandatory anti-corruption training courses. Additional anti-corruption training programs will be introduced for employees of the apparatus of the apparatus of the Company and structural divisions for positions and functions with a high probability of corruption risks. Information about the conducted trainings/trainings and their results is stored in the personnel department of the Company in accordance with the established procedure by the current legislation;

In order to form an intolerant and merciless attitude towards corruption among employees and citizens, to increase their awareness of the work being done and the results achieved in the fight against corruption, regular propaganda and campaigning activities are carried out to combat corruption using thematic audio and video stories and other forms of information;

To notify the Service of suspicions or facts of committing corruption offenses by the management of the Company and employees of its divisions, as well as of identified corruption risks in the activities of the Company and its structure, proposals for improving the industry (Detailed information on communication channels through which you can report corruption is specified in p.-4 of this Policy), special communication channels will be established for applicants;

In case of questions related to the practical application of the provisions of this Policy, as well as the implementation of anti-corruption measures and procedures, the Service will provide qualified advice to the employees of the Company and its structure;

The labor contracts of the Management Board of the Company, as well as all workers and employees, including members of the Management Board of the Company, introduce additional requirements and obligations to combat corruption;

All special communication channels of the Service for the treatment of workers and employees, citizens (for sending complaints, applications, messages, appeals) are provided by the Service for Work with Employees in a separate section in all employment contracts;

on the basis of the approved work plan, the responsible employees of the Company and its structures carry out information and promotional activities in order to form and implement the behavior of the honesty standard ("honesty vaccine") to combat corruption;

informing contractors (counterparties) about the requirements, obligations, procedures, rules and principles adopted by the Association and its participants in order to combat corruption, including by including additional conditions on combating corruption in business contracts concluded with them;

The Logistics Department of the Company, as well as the department for studying the conjuncture of commodity markets, provides an indication in a separate section of information about all special channels for the treatment of workers and employees, citizens, legal entities, including contractors of the Company (for sending complaints, applications, messages, appeals) in all business contracts.

g) monitoring, control and reporting:

The Service assesses the adequacy, proportionality and effectiveness of measures, control measures, procedures and rules implemented in the field of combating corruption in the Company and its structure, and carries out control and control activities on an ongoing basis. Based on the results of the control and control activities carried out, appropriate measures will be taken to further improve the anti-corruption structure of the Company and its structure.

The following monitoring and control procedures are carried out at the Company and in its structure:

The study of changes in the characteristics and functions of the activities of the Company and its structural divisions, as well as changes in the organizational and functional structure and other internal and external factors in the composition of the Company and its composition in the fight against corruption, analysis of the need to make changes to the current system, including bringing the existing systems in accordance with applicable legal compliance requirements;

in accordance with the approved work plan, ensure the reliability and efficiency of the anti-corruption structure of the Company and its structure, as well as identify ineffective control measures and procedures in order to improve them and eliminate corrupt practices, internal procedures and production processes are controlled by the Service on the basis of voluntary election to the executive office of the Company and regarding the reciprocity of powers, tasks and functions, rights and obligations of structural units;

The Service carries out analysis and control over compliance with the requirements and regulations related to combating corruption by the Service, the Company and its employees who have the appropriate authority when conducting internal audits;

The Service exercises control over the full execution by officials and executives of the executive office of the Company of instructions for the implementation of anti-corruption measures in a timely manner;

The results of measures to control and monitor the anti-corruption structure are reflected in the quarterly (semi-annual and annual) reports of the heads of the Company's divisions, the Chairman of the Board, members of the Board of the Company.

h) responding to offenses, as well as bringing guilty persons to responsibility:

Compliance with the requirements and rules of this Policy, the implementation of anti-corruption measures implemented in the Company and its structure are mandatory for all employees as part of the performance of their official and official duties. Employees are personally responsible for violations of established requirements and procedures. In

addition, the immediate supervisor of the employee is also responsible for corruption offenses committed by employees subordinate to him;

employees who violate the requirements and principles of combating corruption bear disciplinary, administrative or criminal liability in the manner and on the grounds established by the legislation of the Republic of Uzbekistan;

employees, about persons who encouraged, invited or urged them to commit a corruption offense and about the appeals of such persons, as well as any facts known to him of commission of corruption offenses by employees of the Company and its structure, must immediately report directly to the Chairman of the Board of the Company and (or) to the Service;

Taking into account the fact that the principle of tolerance for corruption has been introduced at the Company and its structure, internal inspections on reasonable suspicions that the employees of the Company have committed a corruption offense are carried out in accordance with the requirements of the legislation of the Republic of Uzbekistan and internal regulatory documents of the Company;

Any employee who violates anti-corruption legislation and (or) the requirements of this Policy, as well as anti-corruption requirements and procedures specified in the internal regulatory documents of the Company, regardless of position, position, length of service and other factors, the legislation of the Republic of Uzbekistan and the Company are liable in the manner and for the grounds provided for by internal regulatory documents;

If the fact of committing a corruption offense is revealed, the head of the relevant and (or) department as part of the Executive Office, in cooperation with the Service, conducts a comprehensive analysis of the causes, conditions and other factors of committing a specific offense. offense and submit to the Chairman of the Management Board a reasonable proposal to improve the current anti-corruption system;

The plant and its structural subdivisions cooperate with the competent state bodies, law enforcement agencies and other state bodies and organizations in the field of combating corruption to identify (inquire) and investigate corruption offenses in the Company and its structural subdivisions.

Chapter 4. Main directions of combating corruption

§ 1. Management of conflict of interests

12. The employees of the Company and its structure must strictly adhere to the principles of honesty and integrity in the performance of their duties and positions or represent the interests of the Association and its members, avoid such situations.

A conflict of interest in a situation where the personal (direct or indirect) interest of an employee of the Company and its structure affects or may affect the proper performance of their duties, and a conflict of interests and interests of the Company and its structure arises or may arise between the personal interest of the employee.

Each employee of the Company is obliged to immediately report any conflicts of interest that arise or may arise in the performance of their duties and responsibilities to their immediate supervisor, to the Human Resources Service, as well as to the Service.

13. Employees of the Company and its divisions, when hiring new candidates and transferring employees to another position, are required to annually provide information about their personal interests, which may or may not lead to a conflict of interest and, depending on the relevant circumstances, must immediately inform their direct manager, to the Human Resources Service, as well as to the Service.

Disclosure of information about the conflict of interest of the Company and its participants and the resolution of such situations is carried out in accordance with the Regulation "On the management of conflict of interest" of JSC "Almalyk MMC".

§ 2. Gifts and hospitality in the process o work

14. Any gifts from individuals or legal entities to the employees of the Company in connection with the performance of their duties and responsibilities, or signs of hospitality in connection with the labor process, the provision of services, lending, donations, preferential loans, guarantees and guarantees, payments, remuneration, incentives in in the form of cash or its equivalent, material assets such as property, securities, direct or indirect acceptance of non-material support is prohibited.

15. In any form and form received by the employees of the Company and its subdivisions as part of official delegations, at official events, including gifts abroad, regardless of their value and amount, are the property of the Company and transferred to its balance sheet.

16. In the case of presenting gifts to employees of the Company and its divisions on the occasion of their personal holidays (birthday, childbirth, Defender of the Fatherland Day, International Women's Day), not related to the performance of service and position (position), obligations are recognized as gifts associated with the personality of the worker.

17. When presenting such gifts, the following requirements and rules must be strictly observed:

Gifts must be presented in the presence and with direct testimony of at least three employees of the Company. In this case, in addition to the recipient and donor, the presence of three more witnesses is required;

the process of giving should be accompanied by a congratulatory speech, the event and situation that led to the presentation of the gift should be clearly expressed in the congratulatory speech;

the total value of the gift (including all taxes, fees and obligatory payments) must not exceed 10 (ten) base settlement amounts;

In any case, the total amount of expenses spent by an employee of the Company on a gift to another employee of the Company should not exceed 1 (one) base calculated amount.

18. It is forbidden to receive gifts and other tangible and intangible assets from representatives of state bodies, enterprises and organizations, representatives of individuals and legal entities (third parties) on the occasion of a personal holiday (mentioned in clause 16 of the Policy).

19. The procedure for presenting gifts by the Company employees at international conferences, symposiums, business negotiations, meetings, meetings and other events related to the performance of official duties is carried out by order of the Chairman of the Board.

20. In any case of doubt or doubt about the legality of accepting or giving a gift, the Mill and its employees should contact the Service for advice.

§ 3. Selection of employees, transfer from position to position, financial incentives

21. Conducting a competition for a new set of candidates for part-time jobs, transferring employees from one position to another, passing their qualification certification, evaluating the results of work, sending them on foreign business trips, paying bonuses, determining the amount of payments in the form of bonuses and other types of incentives and incentives for all employees must be open, transparent, transparent, equal and impartial, in accordance with the principles and requirements of this Policy.

22. It is necessary to develop a procedure and criteria for assessing the main performance indicators of the management of the Company and its divisions, which serve as the basis for rewarding managers and employees.

The results obtained on these indicators must be completely impartial, fair, transparent and openly discussed with the Mill and its employees.

§ 4. Rules and requirements for conducting official investigations, monitoring, studies

23. When conducting internal investigations, monitoring, control and studying activities, the Service and the involved employees of the Company must strictly observe the following rules and requirements:

avoidance of conflicts of interest;

inspection of the object is not carried out by one employee;

in order to falsify possible offenses, representatives of the inspected object should not use their ignorance to distort the norms of the law, do not threaten the employees of the inspected object with the presentation of the revealed facts to law enforcement agencies;

do not threaten the employees of the inspected facility;

not to be interested in issues that are not included in the subject of verification, and not to request documents;

give a legal and professional assessment of each fact of violation revealed during the investigation;

In the event that employees and (or) representatives of the inspected object offer bribes and (or) other material assets or services to employees conducting an internal inspection, in order to conceal the violations identified, conceal or reduce the amount of damage caused, the inspector immediately notifies the head of the inspection team and notifies head of the Service;

The inspecting employee must be impartial in interaction with employees and (or) representatives of the inspected object in accordance with the principles defined in the Code of Conduct of JSC Almalyk MMC.

24. Ethics commissions or appellate bodies in the executive office of JSC Almalyk MMC for judicial review of applications and complaints against decisions made as a result of activities carried out by other divisions and structures of the Company, whose competence includes functions and organizes such powers as conducting official audits, monitoring and research.

The management of the Company, the heads of its divisions, officials, employees and employees have the right to collect and present evidence for the purpose of self-defense and receive information about the violation of the regime committed by them, the procedure for considering the case of violation of the board, as well as personally or their representatives in the manner prescribed by law in connection with the decisions taken, they have the right to appeal through (lawyer).

§ 5. Interactions with contractors (partners) and third parties

25. All employees of the Company in relations with counterparties (counterparties) and third parties must:

adhere to the principles of legality and transparency;

refrain from any actions that are contrary to the requirements of this Policy and that can cause corruption risks.

26. At the stage of selection and evaluation of product suppliers, contractors, partners and other contractors (counterparties) of the Company and its employees at all levels and levels, in accordance with the legislation of the Republic of Uzbekistan on public procurement, competition and internal regulations, legality, objectivity, ensure honesty, fair competition, open and transparent process.

27. The plant and its employees are counterparties in mutual cooperation with (contract partners):

checks the reliability of the future counterparty (contractor), including the presence of facts of corruption and violations in the past, the absence of a conflict of interest with the employees of the Company;

informs and acquaints the future counterparty (competitor, tender winner and procurement counterparty under direct contracts) with the anti-corruption principles and requirements of the Company by including rules and conditions in the text of economic agreements concluded with them, providing for the introduction of a special and separate legal obligation against corruption.

§ 6. Charity and sponsorship

28. The Company and its subdivisions may accept charity and sponsorship only in cases provided for by applicable law. When receiving such assistance, the Company and its subdivisions must avoid conflicts of interest, ensure the efficient, purposeful and rational use of donations or sponsorship funds only for the purposes established by law or the relevant agreement, as well as reports and information on the assistance received and on their spending will be communicated to the general public through the official website of the Company, social networks and the media.

§ 7. "Secret Client" action

29. In order to determine the quality and the established price of products (goods), services (works) developed and sold by the Company and its constituent subdivisions, as well as the tendency of the Company's employees to commit corruption offenses, a deliberately false transaction with the Company and its constituent parts by creating, that is, in order to establish and document the fact of violation of the law, special control measures are carried out, consisting in the purchase or delivery of goods, currency and other material assets and other items without the purpose of consumption or sale.

In the course of such control measures, products (goods, works, services), quality of services (works), delivery times and other important conditions, as well as this Policy, the Code of Conduct will be mainly changed. In the Service, Conflict of interests of the employees of the Company, compliance with the rules established by the Regulations on Management, including the propensity of managers, officials and employees to bribery.

30. Reports on the activities of the "secret client" within the framework of the Company and its structure are submitted to the Chairman of the Board, and in case of detection of corruption risks, a decision is made to appoint an internal audit.

§ 8. Video recording and broadcasting of the official activities of the Company and employees

31. To control the activities of employees of the executive office of the Company and structural divisions, audio and video recording cameras are installed, the recordings are viewed by responsible employees of the Company and the Service.

32. The official website of JSC Almalyk MMC hosts online broadcasts of certain processes and procedures with a high risk of corruption (in particular, interviews and testing of employees, including tests, meetings and meetings of procurement commissions, etc.).

§ 9. Internal regulatory documents of the Company Carrying out anti-corruption expertise

33. At the stage of legal expertise of internal regulatory documents and their drafts of JSC Almalyk MMC in order to prevent, identify and eliminate the occurrence of corruption factors that allow committing corruption offenses in existing documents and projects, while the documents of the Legal Department (Legal Service) and their projects also undergo anti-corruption expertise in accordance with the law.

The result of the anti-corruption expertise is reflected in the conclusion prepared on the basis of the results of the legal expertise.

If corruption factors are identified in a document or project, the legal opinion of the Legal Department (Legal Service) must contain recommendations and specific measures aimed at eliminating them.

§ 10. Advising the Company and its employees

34. If the Company and its employees have questions regarding regulatory and legal documents related to combating corruption, as well as the application of this Policy, the Code of Conduct at the service, the Regulations on the management of conflicts of interest or other documents in practice, through the following communication channels to the Service compliance control of the Company by: (+998 71) 202 04 02 (internal phone number: 431) E-mail: info@anticorp.uz or to the Service (+998 70) 619 15 47. By e-mail: stop.corporation@agmk.uz they can contact directly and freely at any time of the day.

Chapter 5. Reporting corruption offenses

35. If there are reasonable doubts and suspicions about the legality of the actions of the employee of the Company or compliance with the rules and requirements of this Policy, the "Code of Conduct", "Regulations on the management of Conflicts of Interest", the actions of the employee contain the elements of a corruption offense or otherwise if illegal signs are found, in the presence of clear facts and evidence confirming the commission of a corruption offense, employees or third parties must immediately bring such information and messages to the head of the Service and (or) law enforcement agencies through the communication channels specified in paragraphs 34 and 38 of this Policy.

36. The chairman of the board of the Company, heads of structural divisions ensure the confidentiality and security of persons who have provided reliable information about violations of the law, guarantee that they will not be fired from their jobs or otherwise subjected to persecution in any other form for criticizing or expressing their opinion.

37. Members of the management board of the Company, heads of structural divisions protect the rights and interests of employees entrusted by the head of the service, from actions aimed at retribution against them, including dismissal, demotion, discrimination, insults, limitation of remuneration and encouragement, pressure, threats and intimidation to ensure that persons who report suspicious actions of other employees of the Company or their possible violation of the anti-corruption requirements of this Policy will not be held accountable.

38. Messages about detected corruption offenses in the activities of the Company and its employees can be sent to the Compliance Control Service at any time of the day via the following communication channels:

(+998 93) 182 10 04; “(+998 71) 202 04 02 (ext.: 431)” or “(+998 70) 619 15 47”.

They can contact by e-mail: info@anticorp.uz.

Other telephone numbers of the Service in the executive office:

(+998 93) 182 09 04; (+998 70) 619-23-33; or (+998 78) 141-93-33.

Service Channel @OKMKcompliance and other Telegram channels of the Service;

On the following official web page of Almalyk MMC JSC: <https://agmk.uz/ru/obyavleniye/korrupsiyaga-karzith-kurash>, as well as on the following page of the authorized state body: [https://anticorp.uz/ru/item /report-corporation](https://anticorp.uz/ru/item/report-corporation) by filling out the forms posted on the official website;

E-mail address of the service: stop.corp@agmk.uz.

directly to law enforcement.

41. To respond to a message sent by the workers of the Company, the applicant is not contacted in the following cases:

lack of additional information necessary to conduct a full and comprehensive audit of services;

Providing deliberately false or slanderous information by an employee of the Company or third parties is considered a gross violation of the provisions of this Policy and may serve as an example of unethical behavior.

42. Employees and third parties who in good faith reported the facts of corruption in the divisions of the Company, subject to full confirmation of the information and information provided by them, to the executive office of JSC Almalyk MMC. Regulations on the procedure for encouraging persons who reported corruption offenses committed in structural divisions, or otherwise contributed to the fight against corruption. They can also be encouraged on the basis of the relevant decision (order) of the chairman of the board.

43. The principles of operation of all communication channels in the Company, information on the processing and consideration of received messages are specified in the Regulations on communication channels for reporting corruption information of JSC Almalyk MMC, as well as in other relevant internal regulatory documents of the Company.

Chapter 6. Procedure for reviewing, amending and supplementing the Policy

44. This Policy is subject to revision and change in the following cases:

in the event of a change in the legislation of the Republic of Uzbekistan in the field of combating corruption in part related to the need to review existing anti-corruption policies and procedures;

in cases of revealing ineffective control and anti-corruption procedures, as well as if it is necessary to improve measures aimed at preventing and combating corruption in the activities of the Company and its divisions;

When changing the organizational and legal structure of the Company and its subdivisions, their tasks and functions, features of activities and other rules and regulations, this Policy may be revised, changes and additions may be made to it.