

REGULATIONS
on the Procedure for mutual
cooperation with the governmental
bodies engaged in anti-corruption
activities of JSC “Almalyk MMC”

Chapter 1. General

1. This Regulation in accordance with the Law of the Republic of Uzbekistan "On Combating Corruption" and subparagraph "d" of paragraphs 11 and 12 of the "Model Regulation on the activities of internal control structures to combat corruption" approved by order of the director of the Anti-Corruption Agency of the Republic of Uzbekistan dated October 6, 2021 No. 27 (registered by the Ministry of Justice on 08.09.2021 No. 3319), determines the procedure for interaction in the field of combating corruption of the Joint-Stock Company "Almalyk Mining and Metallurgical Combine" (hereinafter - the Combine) directly engaged in anti-corruption activities and participating in it with other state bodies and organizations (hereinafter referred to as the Authorized Bodies), as well as the competence, rights and obligations of the internal control structure for combating corruption - the Compliance Control Service of the Combine within the framework of similar cooperation.

Direct cooperation with the competent authorities in the field of combating corruption, as well as coordinating the joint work of the Combine in this direction, is carried out by the internal control structure for combating corruption – the Compliance Control Service (hereinafter referred to as the Service) of the Combine.

Within the framework of this Regulation, cooperation is provided within the framework of individual works on such cases as corruption offenses involving the plant and its employees, including conflicts of interest, or on systemic problems (works) in the field, exchange of information and information, free access and use of electronic databases authorized bodies, creation of joint working groups.

Within the framework of this Regulation, the cooperation of the Combine with the competent authorities is based on the principles of ensuring legality, mutual interest, efficiency, efficiency and effectiveness, as well as legislative acts adopted in order to prevent and combat corruption, as well as timely informing the general public about the measures taken in this area.

2. The following basic concepts are used in this Regulation:

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

acts of corruption - direct or indirect, personally or through third parties, receiving, demanding, extorting, offering, promising and giving a bribe, that is, money, securities, other property, property services, other property rights for action or inaction on the part of an employee in in the interests of the bribe giver, mediation in giving and/or receiving a bribe, receiving payments to simplify formalities, illegal use by a person of his official position in order to receive a bribe and for other illegal purposes;

anti-corruption system - a set of measures to prevent corruption violations of the current legislation and internal regulatory documents of the Combine, to ensure the implementation of activities by the Plant and its employees on the basis of corporate rules of ethics and behavior at a high level;

corruption risk - the probability and risk of committing corrupt acts by the employees of the Combine or third parties on behalf of the divisions of the executive office and (or) structural enterprises of the Combine and (or) in their interests;

corruption offense - an act that has signs of corruption, for which the legislation provides for liability for the committed;

employee (employees) - any natural person entering into labor relations with the executive office, as well as structural subdivisions of the Combine, including members of the Board of the Combine.

3. In accordance with this Regulation, the Service establishes mutually beneficial cooperation with the following competent authorities and organizations in order to take measures within its competence to identify and prevent cases of corruption in the executive office, as well as structural divisions of the Combine, eliminate their causes and conditions, and avoid conflicts of interest , and form an (intolerant) uncompromising attitude towards any form and manifestation:

Anti-Corruption Agency of the Republic of Uzbekistan;

General Prosecutor's Office of the Republic of Uzbekistan, Almalyk Specialized Prosecutor's Office of Tashkent Region;

Almalyk Town Department of the Tashkent Regional Department of the State Security Service of the Republic of Uzbekistan;

Almalyk Town Department for Combating Economic Crimes under the General Prosecutor's Office of the Republic of Uzbekistan;

Department of Internal Affairs No. 1 of the Department of Operative-Investigative Cooperation of the Ministry of Internal Affairs of the Republic of Uzbekistan;

Almalyk Town Department of Justice of the Tashkent Regional Department of Justice;

Almalyk Town Department of the Bureau of Compulsory Enforcement under the General Prosecutor's Office;

According to the legislative acts of the Republic of Uzbekistan, cooperation is carried out with other state bodies and organizations that have the authority to prevent and combat corruption, which are entrusted with the task of monitoring and verifying compliance with the law.

4. In accordance with this Regulation, the Service cooperates with the competent authorities and organizations in the following areas:

a) in the field of improving the activities of the Anti-Corruption Works:

on the development of draft internal regulations aimed at the implementation of measures to combat corruption in the Combine;

on submitting anti-corruption measures to the Chairman of the Board for development and approval;

on the development of proposals for the prevention of corruption norms identified in the regulatory legal acts of the activity and internal regulatory documents of the Combine;

on evaluation and issuance of conclusions in terms of compliance, acceptability and relevance of draft anti-corruption measures developed by the executive office, as well as structural divisions of the Combine, with the Anti-Corruption Policy of the Combine;

on the development of specific proposals aimed at further effective organization and improvement of anti-corruption activities in the Combine.

b) in the field of crime prevention and combating corruption at the plant:

on coordination and control of work on the generalization of measures to identify corruption risks, reduce the identified risks based on their results, as well as the formation of a list of positions with high corruption risks of the executive office and structural divisions;

on the collection of information and data on the state and directions of committing corruption offenses in public authorities, including in territorial divisions, state unitary divisions and institutions, as well as organizations with a state share of more than 50 (fifty) percent in order to assess the likelihood of committing similar offenses in the Plant;

to control the correct and complete reflection of information on internal audits on the facts of corruption in the Register of internal audits entered in the Combine or other relevant document on the registration of internal audits carried out;

on the analysis of a conflict of interest in the implementation of public corporate purchases, verification of the reliability of any legal or natural persons (individual entrepreneurs) trying to enter into a contractual relationship with the Plant (with the exception of demand relationships);

to provide clarifications and recommendations on issues of combating corruption to employees of the executive office, as well as structural divisions of the Combine;

on the analysis of the results of the activity of special information communication channels of the Combine, designed to report facts of corruption and transfer analytical materials to the chairman of the board, as well as employees of the Combine;

on conducting social surveys on corruption among the population and employees of the Combine in order to identify corruption cases and risks in the activities of the Combine;

to control the proportionality and adequacy of the penalties applied to employees subject to disciplinary liability as a result of violation of anti-corruption requirements and norms;

on the analysis of information and data on the results of a preliminary investigation or internal checks on the facts of corruption conducted by the executive office and/or structural divisions of the Combine in order to further improve the implemented anti-corruption system of the Combine;

to provide the Chairman of the Board with reliable and verified information and information about the results of the preliminary investigation or internal audits conducted on the facts of corruption, as well as on the state of corruption on a quarterly basis, also, if necessary, on behalf of the Chairman of the Board;

c) in the field of ensuring and monitoring the effective functioning of the system introduced to combat corruption in the Combine and structural divisions:

to monitor and control the fulfillment of the tasks assigned to the Plant by state anti-corruption programs;

to ensure the compliance of the system implemented at the plant with the requirements of the international anti-corruption standard ISO-37001:2016;

on the development of part of the anti-corruption norms of curricula for advanced training of employees of the executive office, as well as structural divisions of the Combine;

on the development of special training materials on the prevention of corruption for the employees of the Combine, including the control of the participation of employees holding positions with high corruption risks;

to control the conduct of anti-corruption trainings for all employees of the Combine, as well as the participation of employees in them in accordance with the curriculum;

on participation in anti-corruption propaganda activities among the workers of the Combine and citizens;

to ensure the updating of information posted in the "Anti-Corruption" section on the official website of the Combine, as well as on its pages in social networks

on monitoring and control over compliance by the employees of the Combine with the legislation of the Republic of Uzbekistan in the field of combating corruption and internal documents of the organization for preventing and combating corruption;

to promote the initiative to conduct internal audits of corruption acts committed with the participation of the workers of the Combine, and their participation in them;

to check the objectivity and acceptability of decisions made by ethics commissions on the regulation of conflicts of interest;

on the development of recommendations for improving the anti-corruption system based on the results of monitoring, internal audits and control measures;

on organizing anti-corruption work and conferences, meetings, seminars, competitions and other events aimed at improving the legal literacy of employees in cooperation with the structures (persons) responsible for combating corruption at the plant;

to conduct an audit of the Company's activities for compliance with internal regulatory documents and international anti-corruption standards;

d) in the field of cooperation with other state bodies and organizations engaged in anti-corruption activities and participating in it:

on participation in the development of measures to increase the legal awareness and legal culture of the population, the formation of an uncompromising attitude towards corruption in society;

in sending requests for providing the necessary information to the competent authorities of foreign states and participating in responding to their requests in accordance with the tasks of combating corruption assigned to the Plant by legislative acts;

on the development of proposals for attracting foreign specialists to improve measures to combat corruption of the Combine;

on the implementation of measures to prevent corruption or investigate corruption crimes.

The Compliance Control Service, in accordance with legislative acts, cooperates with law enforcement agencies in other areas and activities to combat corruption.

5. The Compliance Control Service of the Combine directly cooperates with state bodies engaged in anti-corruption activities in the following areas:

systematic analysis of the state of corruption in the subdivisions of the executive office and structural subdivisions of JSC Almalyk MMC, identifying the causes and conditions for committing corruption offenses and developing joint proposals for their elimination;

coordination and control of activities carried out by the executive office and structural divisions of the Combine in the field of preventing and combating corruption;

ensuring the effectiveness of the procedures for the Legal Department to conduct an examination of the internal regulatory documents of the Combine and their projects for combating corruption by the department;

analysis of the effectiveness of the anti-corruption control system in the field of financial resources at the disposal of the Combine, including the targeted and effective use of debts of international financial organizations and foreign countries, the sale (disposition) of assets, property, goods and material assets at the disposal of the Combine, as well as purchases and tenders conducted by the plant, as well as the development of joint proposals for its improvement;

Ensuring effective cooperation with information dissemination authorities, the media, social networks and other civil society institutions in cooperation with the Information (press) for the prevention, early detection and combating corruption in the Executive Office and structural divisions of the Combine;

ensuring legal requirements when conducting procedures and tenders for the purchase of inventory items, hiring citizens, changing the positions of employees, their promotion in material and other forms, the effective, rational and targeted use of credit and borrowed funds of the Combine. association, privatization, decentralization, write-off of property, assets, construction and reconstruction works for the needs of the executive office and structural divisions of the Combine;

Organization of sociological, scientific and other research, training and retraining of personnel in the field of preventing and combating corruption in order to identify the state, development and causes of corruption in the executive office and structural divisions of the Combine.

6. Within the framework of these Regulations, the mutual cooperation of the Compliance Control Service with state bodies for combating corruption is carried out in the following forms:

exchange of information on the measures taken to prevent and combat corruption;

mutual exchange of information on criminal cases on facts of corruption, cases of administrative offenses, as well as measures taken to respond to corruption facts;

creation and provision of all necessary conditions for free and quick receipt of information and references to authorized employees of the Service for Controlling Complaints of Corruption Violations identified in the subdivisions of the executive office and/or structural subdivisions of the Combine from electronic and other databases of state bodies directly engaged in anti-corruption activities corruption;

creation of joint working groups for conducting research and administrative investigations, conducting internal audits, implementing monitoring and control measures, and preparing analytical materials;

mutual exchange of statistical data and data in other forms;

joint study of available information about the facts of corruption that attracted public attention, as well as publications in the media.

7. Members of the management board of the Combine, workers and employees of structural divisions, as well as employees of state bodies directly engaged in anti-corruption activities, are obliged not to disclose state secrets that have become known to them in the process of interaction, information constituting a commercial or other secret protected by law.

Chapter 2. Interaction between the plant and its structure to ensure the implementation of a unified state policy to prevent corruption

8. State bodies directly involved in anti-corruption activities officially notify the Compliance Control Service of the status and results of consideration of reports sent to them about facts of corruption in order to initiate a criminal case or take other measures of influence within the time frame and in the manner established by the procedural legislation.

9. Compliance control services have the right to request from the State bodies engaged in anti-corruption activities information and information related to the consideration of relevant cases on reports containing facts of corruption that occurred with the participation of employees of the executive office and/or structural divisions of the Combine, that is, they caused a massive resonance and discussion, that is, the emotional reaction of the public to a particular phenomenon, attracted the attention of the public and caused various discussions (hereinafter referred to as the offenses that became the reasons for the discussion).

10. In order to inform the public about the violations that caused the discussion, the Compliance Control Service, together with state bodies directly involved in anti-corruption activities, considering the case, may hold press conferences in strict accordance with the requirements of procedural law and without disclosing the secrecy of the investigation.

11. The Compliance Control Service, together with the bodies specified in paragraph 2 of this Regulation, within five days, on the basis of an agreement with partner bodies on the commission of other corruption crimes and offenses, within a certain period

(according to the results of a quarter or half a year) or annually in accordance with procedural legislation informs the general public about the state of corruption crimes, trends, causes and conditions for the occurrence of corruption crimes, measures taken to prevent and combat corruption without disclosing the secret of the investigation, as well as state secrets or other information protected by legislative acts.

Chapter 3. Interaction on appeals about corruption violations committed with the participation of employees of the Combine

12. In case of receipt through special communication channels of the Combine of appeals and messages from employees and employees or third parties (individuals and legal entities) about the presence of signs of a corruption crime committed at the plant and in its system, this appeal is immediately sent to the internal affairs bodies in cases , confirming the signs of a crime and an offense, with an official letter or a certified telephone message, telegram or radiogram to the Almalyk Specialized Prosecutor's Office, other state bodies directly engaged in anti-corruption activities to resolve the issue of taking legal measures on the situation (initiating a criminal case).

Copies of such documents and materials are submitted for review to both the chairman of the administration, the Supervisory Board, and, without fail, the Anti-Corruption Agency of the Republic of Uzbekistan.

13. Employees responsible and authorized from both sides for coordination of issues of practical interaction between the Combine and state bodies engaged in anti-corruption activities are appointed on the basis of relevant orders.

Chapter 4. Cooperation in the joint study of reports of corruption violations identified in the executive office, also at the structural divisions of the Combine

14. Procedures and tenders for the purchase of inventory items for the production needs of the executive office and/or structural divisions of the Combine, in the process of hiring citizens, changing the positions of employees, stimulating them in material and other forms, effective, rational and targeted use of credit and of borrowed funds of the Combine, privatization of assets, denationalization, sale of property, write-off of assets, inventories, fuels and lubricants, machinery, equipment, study of reports on the targeted and efficient use of materials and spare parts, violations of construction and reconstruction, Compliance Control Service The plant has the following rights and powers:

Request and receive documents and information on the subject of research from state bodies engaged in anti-corruption activities, as well as from the board, divisions of the executive apparatus, structural divisions of the Combine;

send a request for internal checks on specific facts to the administration of the complex, departments of the executive apparatus and subdivisions of the system and receive from them information and a certificate on the results of such activities based on surveys (representations) of state bodies engaged in anti-corruption activities;

freely and freely use electronic and other types of databases of state bodies engaged in anti-corruption activities, as well as the board, divisions of the executive apparatus, structural divisions of the Combine;

exercise control over the achievement of full compensation for the place of damage caused to the interests of the Combine as a result of corruption crimes;

the conditions and rules for the use of closed databases of state bodies engaged in anti-corruption activities, in each specific case, are decided on the basis of an agreement between the parties.

15. The Compliance Control Service, in accordance with the procedure established by legislative acts, submits to state bodies engaged in anti-corruption activities its proposals and recommendations of the following content based on the materials of the study (service checks, studies, monitoring and control measures) conducted within its competence:

criminal proceedings;

initiation of an administrative case.

16. The compliance control service sends submissions to the divisions of the executive office of the Combine and divisions of the system to initiate proceedings or other appropriate measures related to disciplinary offenses, the execution of which is considered mandatory.

17. The right (authority) of the Compliance Control Service to promptly obtain information and information directly from electronic and other databases of the units of the executive apparatus, as well as structural plants in the framework of administrative and criminal cases initiated in the prescribed manner by state bodies engaged in anti-corruption activities, guaranteed by the chairman of the board and members of the board. Officials, as well as employees who in one form or another hindered or resisted the activities of employees in the process of exercising this right (authority), are held accountable in the prescribed manner.

18. Information regarding corruption violations committed in the executive office and/or in the structural divisions of the Combine, also as a result of internal audits (studies, monitoring or control measures) carried out independently by the Compliance Control Service, is sent to the Chairman of the Board, the Supervisory Board, and on behalf (resolution) of the chairman of the board - to law enforcement agencies.

Chapter 5. Mutual cooperation in the examination of internal regulatory documents of the Combine and their projects for combating corruption

19. Based on the study of appeals, media reports of individuals and legal entities, also on its own initiative, the Compliance Control Service has the right and authority to come out with a proposal to ensure that an expertise on combating corruption of the existing internal regulatory documents of the Combine or their drafts by authorized divisions (Legal Department, project initiators).

At the same time, according to the request of the Compliance Control Service, the Legal Department must carry out an anti-corruption expertise of the internal regulatory documentation of the Combine no later than ten calendar days from the date of receipt of the request or submit its official opinion on the presence or absence of factors causing corruption.

20. If necessary, in order to conduct an anti-corruption examination of the internal regulations of the Combine or their drafts, the Compliance Control Service submits to the Chairman of the Board a proposal to create a working group with the involvement of senior officials of the justice authorities and the legal department with appropriate qualifications and experience.

21. At the request of the Combine, the Almalyk Specialized Prosecutor's Office, the Department of Internal Affairs No. 1, and the Department of Justice of the town of Almalyk, within ten days, will consider the possibility of mobilizing employees with appropriate

qualifications and experience to the Working Group for conducting an examination on combating corruption, also in case of a positive decisions will ensure the participation of the employee in the activities of the Working Group.

22. In case of detection of rules or procedures related to corruption, as a result of legal examination of the internal regulations of the Combine or their drafts, as well as anti-corruption examination, the legal department immediately (within 3 days) notifies the Chairman of the Board about this, also develops and submits for approval in accordance with the established procedure, the relevant draft of the internal regulatory document of the Combine.

Chapter 6. Final provisions

23. State bodies carrying out anti-corruption activities and the Compliance Control Service may use information and communication technologies in the process of exchanging information within the framework of mutual cooperation.

23. The Compliance Control Service collects, stores, processes information obtained in the framework of cooperation with state bodies engaged in anti-corruption activities, and uses this information in order to effectively organize activities to prevent and combat corruption in the executive office and structural divisions of the Combine.

24. The Compliance Control Service analyzes the implementation of this Regulation at the end of each year and, if necessary, submits to the Chairman of the Board, as well as the Supervisory Board, its proposals for its further improvement.

25. In the event of a change in the legislative acts of the Republic of Uzbekistan relating to combating corruption, or the need to improve procedures related to the conduct of internal audits, this Regulation is subject to revision and amendment.

26. Officials and employees found guilty of violating the provisions of this Regulation are subject to disciplinary or other form of liability in the manner and on the grounds established by the legislation of the Republic of Uzbekistan and internal regulations of the Combine.