

REGULATIONS
of receipt and review of incoming
reports of corrupt actions, as well as
offenses in the system through the
communication channels organized at
JSC “Almalyk MMC”

Chapter 1. General

1. These Regulations have been developed for the purpose of early detection of cases of corruption and their prevention, prevention of their causes and conditions, increasing the effectiveness of measures aimed at preventing conflicts of interest and forming the uncompromising attitude towards corruption in the executive office and structural divisions of Joint Stock Company "Almalyk Mining and Metallurgical Combine" (hereinafter referred to as the Combine).

2. The Regulations determine the basic principles for handling incoming reports of corrupt behavior committed by the employees of the Combine through special and separately organized communication channels of the Combine, as well as the procedure for receiving messages, organizing their registration and consideration, as well as submitting a report to the Chairman of the Board.

3. For the purposes of this Regulation, the following basic concepts are used:

Hotline – a system that allows to centrally accept, classify and systematize applications received on a separate and specially organized "Helpline" of the Combine, as well as monitor their timely and high-quality consideration;

Applicant – any individual and (or) legal entity or employee of the Combine, who, through communication channels, apply for information about acts of corruption committed by employees of the Combine;

conflict of interest – situations in which the direct or indirect personal interest of a person holding a certain position at the Combine, affects or may have such an influence on the disinterested and objective performance of official (service) obligations;

Corruption – illegal use by an employee of the Combine of his official position or service (position) in order to obtain material or non-material benefits in the interests of his personal interests or other persons, as well as the illegal provision of such benefits;

Corrupt actions – the action or immovability of the material interest of the Combine employee directly or indirectly in the interests of the bribe taker, personally or through third parties, including money, securities, property and property rights in other forms, the acquisition, demand, collection, offer or giving of a bribe and / or receive or intermediary in doing so, collecting facilitation payments (bribery);

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

Anti-corruption system of the Combine – a set of measures to eliminate corruption violations of the current legislation and internal regulations, ensure a high level of professional and moral activity of the Combine's employees;

Corruption risks – the danger of committing corrupt acts by employees or third parties and/or on behalf of the Company and (or) in their interests;

Related (relevant) message – a message consisting of information about corrupt practices and (or) conflicts of interest involving employees of the executive office, structural divisions of the Combine;

Employee – any individual who has entered into an employment relationship with the plant and its staff (including members of the Management Board);

Personal interest of an employee – the possibility of obtaining personal benefits (personal, social, financial, political and other commercial or non-commercial interests) in the form of cash, tangible or intangible assets, other property and benefits that may affect the employee's performance of his official duties in his own interests or the interests of third parties during the performance of their own official duties.

4. The activities of special and separate communication channels designed to notify about acts of corruption and offenses with the participation of employees of the executive office of the Combine and structural divisions are organized on the basis of the following principles:

the principle of confidentiality and security – all authorized employees of the Combine who are allowed to use messages in communication channels are strictly prohibited from transmitting (disclosing) these messages to unauthorized persons. In case of disclosure by the applicant when sending a message to other employees or third parties at their own discretion, including as a result of their negligence, the employees of the Combine will not be liable for disclosure of the secret message and its consequences;

The principle of legality – reception, registration, processing and consideration of messages that arrive on specially organized communication channels of the Combine are carried out strictly in accordance with the requirements of the legislation of the Republic of Uzbekistan and the requirements of this Regulation;

The principle of non-admission of persecution of the applicant – an individual or legal entity who voluntarily reports corrupt practices or conflicts of interest through communication channels, in particular an employee of the Combine, is guaranteed not to be held liable in any form, regardless of the content of the message. This rule does not apply to persons who knowingly provide defamatory or false information;

The principle of feedback with the applicant is mandatory - if the message is not anonymous, then the results of its consideration must be brought to the attention of the applicant by the Combine;

The principle of mandatory application of measures of influence – in case of confirmation of the fact of corruption, the members of the Management Board and the Compliance Control Service of the Combine act in accordance with the legislation of the Republic of Uzbekistan to bring the perpetrators to justice.

Chapter 2. Communication channels for reporting corrupt practices

5. A corresponding (relevant) message can be sent via the following communication channels:

Virtual reception of the President of the Republic of Uzbekistan (<https://pm.gov.uz/>);
Anti-Corruption Agency of the Republic of Uzbekistan
<https://anticorruption.uz/uzc/item/report-corruption>);

through the official web page of Almalyk MMC JSC on the Internet (<https://agmk.uz/ru/menu/helpline->) or by email (stop.corruption@agmk.uz);

The official channel and pages of Almalyk MMC JSC in social networks (for example, the official Facebook page <http://www.facebook.com/agmkofficial>);

by hotline numbers of JSC “Almalyk MMC”: (+998 70) 619-23-32; (+998 78) 141-93-32 (through hotlines and other work by phone numbers);

Telegram bot of JSC “Almalyk MMC” (http://t.me/ao_agmk or (@OKMK_OFFICIAL_bot), contacting the management or the compliance service of JSC “Almalyk MMC” verbally (personally)) (+998 78) 141-90-99 (Call center); (+998 78) 141-90-09 (commutator) (+998 70) 619-56-31 (Office Manager’s service – for sending letters);

Through the law enforcement agencies (371) 232-10-07 or (phone: 71 202 04 02 (internal: 431) E-mail: info@anticorruption.uz);

in means of communication of another form, not provided for by these Regulations.

6. Information about the communication channels of the Combine on the official web page of the Combine on the Internet (<https://agmk.uz/ru/contacts>), posted on pages and

channels on social networks, and also included in e-mails, handouts without fail and training materials, which are periodically sent to employees. In addition, information about communication channels is also reflected in thematic posters, leaflets, social videos posted on the facade of all buildings and structures that are on the balance sheet of the Combine.

Chapter 3. The procedure for receiving relevant messages received via communication channels

7. Responsible for reviewing corruption offenses committed with the participation of employees of the Combine, or relational reports of such behavior is the structure of internal control against corruption – the Compliance Control Service (hereinafter referred to as the Compliance Control Service) of the Executive Office of the Combine.

8. Relevant messages received through the following communication channels are registered in the manner prescribed by the requirements of the "Typical Regulation on the Procedure for Working with Appeals of Individuals and Legal Entities to State Bodies, State Institutions and Organizations with the Participation of the State" approved by Resolution of the Cabinet of Ministers of 7 May 2018 No. 341, also "Regulations on the procedure for working with applications from individuals and legal entities at JSC "Almalyk MMC" and its structure" and are submitted to the Chairman of the Board for resolution:

Through the virtual reception of the President of the Republic of Uzbekistan;

Through the official website or the official e-mail of the Combine;

By telephone numbers of the Combine (by helplines and other working telephone numbers);

Verbal (personal) appeal to the members of the Management Board or the head of the Compliance Control Service of the Combine;

through law enforcement authorities;

governmental bodies directly engaged in anti-corruption activities, received through the Anti-Corruption Agency of the Republic of Uzbekistan.

9. One of the employees of the Compliance Control Service is appointed responsible for receiving messages about corruption offenses received through the official channels and pages of the Combine in social networks, as well as the Telegram bot.

At the same time, upon receipt of the relevant message, the responsible officer of the Compliance Control Service contacts the applicant via e-mail or by phone, clarifies the necessary information, registers the message in the "Register of Records of Relevant Messages" and ensures that information is entered immediately (within 24 hours) Chairman of the Board.

The responsible employee of the Compliance Control Service registers and fixes incoming messages from Monday to Friday of the week from 08:00 to 17:00. However, if a message is received outside business hours, the message will be stored for clarification on the next business day.

10. If the applicant has additional materials to confirm his message, such as photographs, documents, audio and video recordings, the employee responsible for receiving the appeal indicates the communication channels (Telegram bot or e-mail) used to provide them, and separately inform the applicant that the information provided is confidential. This information is issued as an attachment to the corresponding (relevant) message.

11. The Chairman of the Board provides the service, signs and transfers the order (resolution) to the Compliance Control Service for operational analysis and consideration of

the relevant message indicating the full name of the heads of the structural executive unit and structures.

12. The Compliance Control Service, within 1 (one) hour after receiving a relevant message, must register it in the "Register for receiving reports of corruption in the Combine and its structure" (hereinafter referred to as the Register) in the form in accordance with the Appendix and consider in accordance with Chapter 4 of these Regulations.

13. Members of the Management Board, heads of divisions of the executive office, as well as heads of all structural divisions of the Combine, create an opportunity for applicants to leave anonymous messages about corrupt behavior and offenses committed with the participation of employees of the Combine, and guarantee the uninterrupted functioning of such communication channels.

If an anonymous message is received, the responsible officer of the Compliance Control Service, if possible, should contact the applicant who sent the anonymous message before registering the message from the register and report the following:

Separate notification about the impossibility of contacting an applicant in order to respond to an anonymous message;

If it is impossible to obtain the necessary additional information from an anonymous applicant, notification of the impossibility of a complete, objective and comprehensive study of the message;

invites the applicant to create a separate anonymous communication channel to communicate with him (that is, an email address without identifying the identity, communication channels through a secret chat in the Telegram messenger, etc.);

If the anonymous applicant does not withdraw his application, then the responsible officer of the Compliance Control Service who received the message must accept the message in the manner prescribed by this regulation and mark the message in the Register.

14. In the process of considering the received messages, the causes and conditions for committing corruption offenses are also analyzed and measures are taken to prevent them in the future and improve the anti-corruption system.

15. All relevant materials, documents and information on received messages (including decisions made and answers sent to applicants) are stored in the Structure for working with appeals of the executive office for the period established by the legislation of the Republic of Uzbekistan, but not less than 10 (ten) years.

16. If a relevant message is received by employees of the executive office of the Combine or employees of structural divisions, the employee who received such a message immediately informs his/her immediate supervisor and / or the Compliance Control Service of the executive office about the received message (appeal) in writing. The Head of the Compliance Control Service shall ensure the consideration of the received message in accordance with the procedure described in paragraph 11 of these Regulations.

17. Divisions of the executive office of the Combine, as well as structural divisions (enterprise, workshop, laboratory, etc.) maintain their own separate Register for accepting reports of specific corruption acts and offenses.

Chapter 4. The procedure for considering reports of corruption, as well as offenses

18. All messages received by the Compliance Control Service are considered by the responsible employees of this internal control structure or, on behalf of the Chairman of the

Board, are considered by divisions of the executive office or structural divisions (enterprise, workshop, laboratory, etc.) of the Combine.

19. It is strictly forbidden to involve an employee and persons responsible for the process of considering reports of corruption and offenses, a person (employee) whose actions the corresponding (relevant) message was received, or an employee and responsible persons with whom a conflict of interest may arise during the consideration process.

20. Upon receipt of a message, an employee of the Compliance Control Service conducts a preliminary check and analyzes its compliance (relevance, that is, checks whether the information indicated in the message (relevant) is directly related to the Combine and whether it concerns corruption offenses and (or) conflicts of interest.

A preliminary check is carried out within 3 (three) business days from the date of receipt of the relevant message to the Compliance Control Service.

21. Regardless of the results of the preliminary check provided for in paragraph 19 of these Regulations, such information is entered (registered) in the Register.

22. If an employee of the Compliance Control Service comes to the conclusion that the message is not appropriate (relevant), such a message must be transferred on the basis of a notification to another structural unit(s) belonging to the Combine within one working day.

23. If the message contains information about corruption and (or) a conflict of interest, as well as sufficient grounds for conducting an internal audit, an employee of the Compliance Control Service applies to the head of the Compliance Control Service with the initiative to conduct an internal audit in the manner prescribed by the internal regulatory document of the Combine.

24. Consideration of the relevant messages within one month from the date of receipt by the Plant, in cases where it is necessary to conduct an audit, request additional materials or take other measures, the terms for their consideration, as an exception, may be additionally extended by one month by the chairman of the board plant, which is reported to the applicant in writing (with the exception of anonymous requests).

25. The response to the appeal is prepared by the Compliance Control Services and is signed by the chairman of the board (with good reason - one of the deputy chairmen of the board).

26. Based on the results of consideration of the relevant messages, a response letter is prepared indicating the results of the study and the applied measures of influence and sent to the applicant in the prescribed manner. In the response letter, it is necessary to explain to the applicant the procedure for exercising the right to file a complaint against the decision made on appeal, if an individual or legal entity does not agree with this decision.

27. The response to the corresponding (relevant) message received through the channel and pages of social networks and the Telegram bot is sent to the applicant in electronic form through the channel and pages on social networks or the Telegram bot.

Chapter 5. Reporting

28. The Regulations can be used by employees of the Compliance Control Service, other relevant state bodies and employees (exclusively those employees who are responsible for considering such messages), as well as the Chairman of the Board of the Combine.

29. Based on the data of the register, the Compliance Control Service, following the results of each quarter, submits to the Chairman of the Management Board of the Combine reports on the relevant acts of corruption and offenses committed with the participation of employees of the Combine, which indicates the following information:

the number of received corresponding (relevant) and reviewed corresponding (relevant) messages;
the number of relevant messages confirming cases of corrupt practices, conflicts of interest;
the number of relevant messages related to violation of the terms of consideration;
the average time for consideration of relevant messages;
communication channels and other statistical analytical information most frequently used by applicants.

Chapter 6. Final provisions

30. Violation of the requirements of this Regulation causes liability in the prescribed manner.

31. This Regulation should be revised when changing the provisions and requirements of the legislative acts of the Republic of Uzbekistan on the appeals of individuals and legal entities, as well as in the field of countering corruption.

Appendix
to the Regulations on receipt and reviewing of incoming
reports of corrupt actions, as well as offenses in the system
through communication channels organized by “Almalyk
Mining and Metallurgical Combine JSC

REGISTER
Reception of reports on corrupt actions,
as well as on offenses with the participation of employees
of JSC “Almalyk MMC” and its structural divisions

No.	Date of receipt of message	Region	Message category (corruption act, conflict of interest)	Date and number registered in the system for working with requests	Communication channel through which the message was sent	Applicant data (natural or legal person, reconnect data)	Brief content of message	Corresponding (relevant) structure to which the message refers	Results of the review Satisfied / clarified / not considered	Date and number of response letter to applicant	Executing person	Head of the structure who considered the appeal	Comment
1.													
2.													
...													