

**Regulations
on the Compliance Control Service of
JSC Almalyk MMC**

1-section General provisions

1. This Regulation has been developed in accordance with the order of April 4, 2022. No. 000364 "On Amendments to the Organizational Structure of the Executive Office of JSC Almalyksky MMP, defines the purpose, tasks, functions, rights and obligations, as well as the procedure for organizing and terminating the activities of the **Compliance Control Service** (hereinafter referred to as the Service) in the Executive Office of Almalyk MMP.

2. Approval of these Regulations, amendments and additions hereunder as well as issues related to the organization and liquidation of the Service, shall be carried out in accordance with the relevant decisions of the Chairman of the Board of the Plant.

3. The Service is the only internal control structure of the Anti-Corruption Plant and is responsible for taking measures to prevent, eliminate their causes and conditions, as well as prevent conflicts of interest and form an uncompromising attitude to corruption.

4. The Service in its activities is guided by the Constitution of the Republic of Uzbekistan and laws, resolutions of the Chambers of the Oliy Majlis of the Republic of Uzbekistan, decrees and resolutions of the President of the Republic of Uzbekistan and orders, decisions and orders of the Cabinet of Ministers, other applicable regulatory documents, decisions, orders and orders of the Chairman of the Board of the Plant, the requirements of the "Anti-Corruption Policy" of the Plant and the rules internal labor regulations, as well as this Regulation.

5. The Service carries out its activities in accordance with the legality, impartiality, openness, transparency in order to independently implement activities on the principles of transparency, the activities of the Service are organized on the basis of direct and direct accountability to the Chairman of the Management Board of the Plant.

6. The head of the service is appointed to the position and dismissed from his post in accordance with the procedure established in accordance with the legislation, in coordination with the authorized state body, on the basis of the relevant orders of the Chairman of the Management Board of the Plant.

7. The staff schedule and organizational structure of the service are approved by the Chairman of the Management Board of the Plant in accordance with the staff schedule, organizational structure and cost estimates of the Plant.

If necessary, the Chairman of the Management Board of the Plant has the right to make changes and additions to the Staffing table, the organizational structure of the Service.

8. Job descriptions of the head of the service, his deputies and employees are approved by the Chairman of the Board of the Plant.

9. Issues related to the qualification requirements for the head of the Service, his deputies, employees and specialists, their tasks and functions, rights and duties, responsibility and personal responsibility are carried out by the head of the Service in accordance with the principles of fair and even distribution of workload and official duties among employees in accordance with the relevant job descriptions.

10. The organization of work in the Service is carried out in strict compliance with the rules of internal labor regulations, fire safety, protection of confidential information and data, protection of the computer system and protection of the property of the Plant.

11. Remuneration of employees of the Service and their stimulation and encouragement are carried out in accordance with the labor legislation of the Republic of Uzbekistan and internal regulatory documents of the Plant. All benefits and preferences provided for employees in the internal regulatory documents of the Plant fully apply to all employees of the Service.

12. In order to perform the tasks and functions specified in this Regulation, the Service interacts with the executive office of the Plant (department, service, site, management, sector, bureau, etc.) and all structural divisions (enterprises specializing in production, provision of services) and coordinates and controls their activities in the field of prevention and combating corruption.

13. The interaction and cooperation of the Service with the executive office of the Plant and structural subdivisions of the Plant is carried out within the framework of the "Anti-Corruption Policy", "Ethics Rules" and other internal regulatory documents in the field of prevention and combating corruption, as well as goals, tasks and functions, as well as rights and obligations provided for by this Regulation.

14. Based on the request of the Service, the executive office of the Plant and its structural divisions (enterprises and workshops) submit to the Service documents, information and information on issues such as identification of factors and their elimination, analysis and monitoring of risks in the field of prevention and combating corruption at the Plant, which are high-risk and have a high probability of negative impact on the production indicators of the Plant.

15. The interaction of the Service with the executive office of the Plant and structural divisions (enterprises and workshops) with workers and employees, as well as managers (officials) is carried out in the form of communication by phone, fax, e-mail, exchange of paper correspondence, personal communication and in other forms.

16. Relations and interaction of the Service with law enforcement agencies, the authorized state anti-corruption body, other state bodies and management bodies, business partners, partners of the Plant, mass media, representatives of the public are based on the principle of priority of the rights and legitimate interests of the Plant.

Chapter 2. The main purpose and objectives of the Service

17. The main purpose of the service is the introduction of a comprehensive system, in particular, a system for combating corruption that meets the requirements of the international standard ISO 37001:2016 on combating corruption at the Plant, and the development, early detection of corruption facts, their causes and their legal awareness in order to eliminate conditions, prevent the commission of corrupt actions, the formation of intolerant (intolerant) among the employees of the Plant attitudes to corruption and culture enhancement, prevention of corruption in the Plant, organization of events, ensuring the execution of documents in the field of anti-corruption.

18. The main objectives of the Service are:

- Assistance within its powers to achieve high profitability indicators of the Plant (enterprises and workshops) by reducing the volume and level of risks and threats;
- preliminary identification of corruption risks and threats in the Plant and the introduction of prevention mechanisms;
- correctly assessing the level of danger of risks and determining the degree of their danger, applying effective and efficient measures to respond to risks classified as "extremely dangerous or high level of danger";
- ensuring the stable development of the Plant by coordinating the activities of corruption risk management in the Plant;
- participation in ensuring the effectiveness of corruption risk and threat management processes by developing, implementing and regularly updating the methodological and legal framework for risk management;
- organization of work on the development of a register of corruption risks, a map of corruption risks and a consolidated/generalized action plan for managing corruption risks at the Plant;
- coordination of work on identification, assessment and organization of control processes of the main risks during the operation of the Plant;
- verification and control of the execution of regulatory and legal documents related to combating corruption, legalization of proceeds from crime, requirements of antimonopoly legislation, tax and other mandatory payments, as well as requirements and rules of internal regulatory documents of the Plant by divisions of the executive office and enterprises (workshops) of the system;
- identification and elimination of violations related to the implementation of complex financial transactions;
- timely detection of abuse of official position or corruption situations and elimination of their causes and conditions, prevention of corruption actions and violations;
- identification and elimination of cases of employees' indifference to their duties (official composure) or violations of legislation by them related to unfair attitude to their work;
- participation in the prevention of illegal actions and threats, such as theft, invasion and robbery for the purpose of stealing the property of the Plant by persons unrelated to the Plant;
- participation in the preliminary identification and prevention of corruption risks and threats that may negatively affect (damage) the business reputation as well as solvency of the Plant;

- coordination and control of the anti-corruption examination of the internal regulatory documents of the Plant, as well as any legal entities and individuals entering into contractual relations with the Plant (partners, business partners and counterparties), any legal entities and individuals in the process of cooperation and entering into contractual relations with the Plant (competent, potential partners and partners), buyers and consumers of goods and services produced and provided by the Plant;

- verification of foreign trade (export and import) agreements (contracts) expected to be concluded by the Plant, as well as contracts related to attracting foreign loans and investments, for compliance with the requirements of sanctions and prohibitions, verification of the validity of their conclusion with the Internal Audit Service, production and financial risks of the Plant summarizes the official (written) conclusions of the monitoring department, legal management, logistics management, initiative units and, based on the relevant conclusions, submits generalized conclusions to the Chairman of the Management Board and, if necessary, to the Supervisory Board;

- making proposals to terminate the execution of contracts (agreements), provided that such contracts (agreements) and transactions (contracts) have sanctions and prohibitions on the sale of goods (services), or when there is a suspicion of circumvention of sanctions, in existing export (import) contracts (contracts), as well as contracts related to attraction of foreign loans and investments;

- implementation of the "sanctions control" function at the Plant, coordination and control of the activities of the executive office of the Plant, as well as the companies (workshops) and divisions within this function;

- taking measures to temporarily restrict cooperation with companies subject to sanctions and restrictions, and making proposals in these cases to the Chairman of the Management Board of the Plant, the Supervisory Board;

- reduction and mitigation (minimization) of corruption offenses committed at the Plant, as well as the consequences of a conflict of interests and the amount of losses caused to the interests of the Plant;

- in order to drastically reduce (minimize) the scale of threats, systematically and regularly carry out control and supervisory measures to prevent corruption offenses and dangers at the Plant, regularly expand the scale and scope of preventive measures in this direction;

- at the end of each quarter, submitting information on the ongoing work on the prevention and early detection of corruption offenses committed at the Plant, identified existing risks and threats, measures taken to eliminate them, as well as reasonable proposals aimed at eliminating the roots of corruption at the Plant to the general meeting of shareholders of the Plant, the Supervisory Board, the Chairman of the Management Board and authorized government agencies;

- implementation and improvement of anti-corruption activities at the Plant, including coordination of the implementation of the international ISO 37001:2016 standard at the Plant;

- coordination of work on prevention and suppression of corruption offenses at the Plant;
- monitoring, coordination and control over the effective functioning of the anti-corruption system at the enterprise;
- cooperation with other state bodies and institutions that carry out and participate in anti-corruption activities.

The Service also performs other tasks and functions in accordance with legal documents.

It is not allowed to assign duties, functions and tasks to the Service and its employees that are not provided for by this Regulation and other regulatory legal acts.

Chapter 3. Service work composition

19. Based on the tasks assigned to the Service, the structure of its work will consist of the following.

Formation and implementation of the system based on the advanced international anti-corruption standards at the plant and the scope of work regarding the improvement:

participates in the development of drafts of internal regulatory documents aimed at the implementation of anti-corruption measures in the Plant, in cooperation with the relevant structures and structural units of the executive office of the Plant;

together with the relevant structures and structural divisions of the executive office of the Plant and develops measures to combat corruption in the Plant and submits them for approval to the Chairman of the Board of the Plant or the Supervisory Board;

together with the relevant structures and structural divisions of the executive office of the Plant, it develops proposals to eliminate corruption norms identified in regulatory documents and internal regulatory documents related to the activities of the Plant;

evaluates the projects of anti-corruption measures developed by the relevant structures and structural divisions of the executive office of the Plant for compatibility, acceptability and relevance for the anti-corruption policy implemented at the Plant, and makes suggestions and recommendations for their improvement ;

ensures the submission of proposals aimed at more effective organization and improvement of anti-corruption activities at the Plant to the Chairman of the Management Board of the Plant, the Supervisory Board and the authorized state body.

20. The composition of work regarding the prevention and suppression of corruption offenses in the relevant structures and structural divisions of the executive office of the plant:

organizes and coordinates the assessment of corruption risks at the Plant, participates in the development of action plans to reduce the identified risks based on their results, and also forms a list of positions with a high corruption risk at the Plant and monitors its regular updating;

collects and analyzes information from open sources on the status and directions of corruption offenses in state and economic management bodies, other public authorities, enterprises with a state share, in order to assess the likelihood of a combination of similar offenses;

analyzes incoming appeals about corruption risks and offenses committed by employees of the Plant through the special information communication channels, and ensures their consideration by officials in accordance with the established procedure;

controls the complete and correct reflection of information on official inspections and other control measures carried out at the enterprise on the facts of corruption in the "Register of Official Inspections Registration" or other relevant document;

participates in the analysis of conflicts of interest in the implementation of public procurement and verification of the reliability of any legal or natural persons entering into contractual relations (except labor relations) with the Plant, and coordinates such activities;

provides explanations and recommendations to employees of the plant on anti-corruption issues;

analyzes the results of special information communication channels designed to report the facts of corruption, and ensures that analytical materials are brought to the attention of the Plant's employees, the Chairman of the Management Board, the Supervisory Board and the authorized state body;

conducts surveys and research among the Plant's employees and the public in order to identify corruption situations and risks in the Plant's activities;

monitors the proportionality and adequacy of sanctions applied to persons brought to disciplinary responsibility for violating anti-corruption requirements and norms;

in order to further improve the anti-corruption system, it analyzes the information and collected documents based on the results of all official inspections conducted at the Plant on the facts of corruption;

according to the results of each quarter or by order of the Chairman of the Management Board, ensures that the Chairman of the Management Board, the Supervisory Board and authorized state bodies are provided with information about the work carried out at the Plant and the corruption situation in the composition.

21. The composition of work regarding the ensuring and monitoring the effective and efficient operation of the anti-corruption system at the plant:

supervises and controls the execution of orders and tasks assigned to the Plant within the framework of the state anti-corruption programs;

makes proposals based on the adaptation and coordination of the anti-corruption system implemented at the company - **ISO 37001:2016** to the requirements and conditions of the **International Anti-Corruption Standard**;

participates in the development of part of the training plans for advanced training of the plant's employees related to the norms aimed at combating corruption;

organizes the development of training materials, manuals, instructions, regulations and other documents on the prevention of corruption for employees who are on the list of positions with a high risk of corruption in the plant, and coordinates work in this direction;

participates in the organization of training, seminars, webinars, master classes and other forms and formats of training and advanced training courses for all employees of the Plant in accordance with the curriculum and the list approved by the Chairman of the Management Board or the Supervisory Board, supervises the provision of the Personnel Service for the participation of employees in such events and, first of all, employees holding positions with the high risk of corruption (including members of the Management Board);

participates in the organization of conferences, symposiums, meetings, seminars, webinars, contests, promotions, flash mobs, social videos and other mass events aimed at the improving the legal literacy of employees;

participates in information and propaganda activities to combat corruption among the Plant's employees and citizens;

coordinates and controls the implementation of the legislation of the Republic of Uzbekistan in the field of anti-corruption and internal regulatory documents of the Plant for the prevention and combating of corruption by all employees, regardless of their position in the Plant;

promotes the initiative of conducting official inspections on the facts of corrupt behavior or conflict of interests committed by employees of the Plant, as well as coordinates, controls and, if necessary, participates in conducting official inspections conducted at the Plant;

verifies the impartiality and legality of decisions taken by ethics commissions established in the relevant structures and structural divisions of the Plant's executive office to resolve conflicts of interest and their compliance with the requirements and rules of the Plant's "Anti-Corruption Policy" and other internal regulatory documents related to this industry;

based on the results of the monitoring, internal inspections and control measures, the Plant develops proposals and recommendations for improving the anti-corruption system in the relevant structures and structural divisions of the executive office and submits them to the competent state bodies on the basis of the instructions of the Chairman of the Management Board;

organizes anti-corruption activities in cooperation with other structures (or responsible persons) responsible for combating corruption in the relevant structures and structural divisions of the executive office of the Plant, coordinates and controls their activities in this sphere;

conducts inspections, studies and control measures to ensure that the activities carried out in the field of combating corruption by the relevant structures and structural divisions of the executive office of the Plant comply with the internal regulatory documents of the Plant and international standards.

22. The structure of work regarding the interaction with other state bodies and institutions engaged in and participating in anti-corruption activities:

participates in the development of measures to improve the legal awareness and legal culture of the Plant's employees, the formation of an intolerant (intolerant) attitude towards corruption among the Plant's employees, coordinates and controls such activities;

sends requests for the provision of necessary information to the competent authorities of foreign states in accordance with the tasks of combating corruption assigned to the Plant by legislative documents and participates in the responses to their requests;

develops proposals to attract foreign and domestic experienced and professional specialists and experts to the relevant structures and structural divisions of the executive office of the Plant to improve anti-corruption measures, implement the system based on the advanced international standards;

The Plant closely cooperates with the law enforcement agencies in the implementation of measures to eliminate corrupt behavior or investigate corruption crimes in the relevant structures and structural divisions of the Executive Office.

23. The Service also carries out other work in accordance with the documents of title.

24. It is not allowed to assign tasks, functions and assignments to the Service and its employees not provided for by this Law.

Chapter 4. Rights and obligations of the Service

25. The Service has the following rights to perform the tasks and functions assigned to it:

receive analytical materials, conclusions, statistical and other information from the employees of the plant on issues within their competence;

request and receive the necessary assistance from the Plant's employees (including members of the Management Board) in the performance of official duties;

conducting official inspections in connection with the revealed corruption violations in the activities of the plant's employees;

making proposals to the Chairman of the Management Board on improving the Plant's anti-corruption system;

The Service, within the limits of its rights and powers, has the right to give recommendations and written instructions, task letters, proposals to divisions in the executive apparatus of the Plant (department, division, sector, service, bureau, office, etc.) to structural divisions (enterprises specializing in the production and provision of services);

participation in meetings and meetings dedicated to combating corruption held at the plant;

has the right to conduct official inspections, demand documents, and receive written explanations from employees. The Service may have other rights in accordance with the legislative acts.

26. The Head of the Service, his deputies and employees bear the following responsibilities for the performance of the duties and functions assigned to them:

perform the functions assigned to the Service by this Regulation and other regulatory legal acts, to the extent necessary and effectively, strictly observing the requirements of legal documents and not going beyond their powers;

immediately notify the Chairman of the Management Board, the authorized state body in accordance with the established procedure, as well as other law enforcement agencies about the detection of signs of a crime, in particular, the facts of committing a corruption offense at the plant;

urgently notify the Chairman of the Management Board about the violation of the requirements and regulations at the plant, "Anti-Corruption Policy", "Code of Conduct" and "Regulations on Conflict of Interest Management";

according to the results of each quarter, in the first decade of the following month, submit a quarterly report on the activities and measures taken to combat corruption at the Plant to the Chairman of the Management Board, the Supervisory Board and the authorized state body in accordance with the established procedure.

27. The Head of the Service, his deputies and employees may have other duties in accordance with the legislation.

Chapter 5. Criteria for evaluating the quality of work and efficiency of the Service

28. The effectiveness of the Service at the Plant:

the effectiveness of the system of early detection and prevention of corruption risks associated with the release, provision of services, procurement, financial and economic operations and other areas, elimination of their causes and conditions, as well as prevention of conflicts of interest and the formation of an intolerant attitude to corruption and is evaluated by the results of achieving targets.

29. Service performance targets and evaluation criteria are approved directly by the Chairman of the Management Board or the Supervisory Board. Control over the achievement of performance performance targets is carried out by the authorized state anti-corruption body in accordance with the procedure established by law.

30. Monitoring of the efficiency and effectiveness of the Service's activities, mutual proportionality and adequacy of the powers and rights granted to the Service, as well as the functions assigned to it, full and high-quality performance, achievement of established targets and tasks assigned to it are carried out by the authorized state anti-corruption body, the Supervisory Board and the Chairman of the Management Board in accordance with the jointly established procedure.

31. The efficiency and effectiveness of the Service's activities are regularly evaluated.

32. Based on the results of the evaluation of the effectiveness and efficiency of the Service, measures are taken:

to encourage (stimulate) the head of the Service, his deputies and employees or to bring them to disciplinary responsibility;

to eliminate the identified shortcomings in the activities of the Service and to further improve its activities.

Chapter 6. Responsibility of the Service

33. The Head of the Service, his deputies and employees are responsible in accordance with the current legislation:

for improper and ineffective performance of tasks and functions assigned to the Service by the Regulations on the Service and Job Descriptions of its employees, other regulatory legal acts;

for non-compliance with the requirements of legal documents and for derogation from their powers;

for untimely informing the Chairman of the Management Board, the Supervisory Board and the authorized state body, as well as other law enforcement agencies about the detection of signs of a crime, in particular, the facts of committing a corruption offense at the plant;

for failure to notify the Chairman of the Management Board within five working days from the date of confirmation of violation of the requirements and provisions of the "Anti-Corruption Policy", "Code of Conduct" and "Regulations on Conflict of Interest Management" at the Combine;

for failure to submit a quarterly report on the activities and measures taken to combat corruption at the Plant at the end of each quarter in the first decade of the following month and the annual report to the Chairman of the Management Board, the Supervisory Board

and the authorized state body for combating corruption in accordance with the established procedure at the end of the year;

The Head of the Service is responsible for failure to perform control over the entry of reports and information on the implementation of Roadmaps", "Events" regarding the preventing corruption risks, as well as corruption states committed subsequently by them, and other assignments and tasks related to them, on the platform Anticor.ijro.uz or another platform within the time limits established by law.

34. The Head of the Service, his deputies and employees of the Service are personally responsible for compliance with the legislation of the documents and conclusions issued by them.

35. Persons found guilty of violating the requirements of this Regulation are held liable in accordance with the procedure established by law.