

**Instructions
for organization of training of staff of
JSC “Almalyk MMC” in the rules of
corporate ethics and conduct, and in the
field of combating corruption**

I. General

1. This Instruction is the basic guide for organization of training of the staff of the Joint-Stock Company "Almalyk Mining and Metallurgical Combine" in the rules of corporate ethics and conduct, as well as combating corruption.

2. This Instruction is aimed at introduction and improvement of the integrated system that meets the requirements of the international standards in the Executive Office and structural divisions of the Combine, in particular, the effective anti-corruption system, in order to timely identify the cases of corruption and eliminate their causes and conditions, prevent committing acts of corruption, increasing their legal awareness and legal culture, organizing preventive measures to combat the corruption, educating employees in the spirit of strict observance of the legislative acts of the Republic of Uzbekistan in the field of combating corruption and internal regulatory documents of the Combine.

3. Programs and training materials for training the staff of the executive office of the Combine and the staff of the structural divisions in the rules of corporate ethical behavior, anti-corruption (hereinafter referred to as Training) are developed in accordance with the legislative acts of the Republic of Uzbekistan in the field of anti-corruption, as well as internal regulatory documents in the field of implementation the compliance service system for combating corruption of the Combine, also by this Instruction.

II. Basic principles of staff training

4. Training of the staff of the executive office and structural divisions of the Combine is organized in accordance with the following basic principles:

objectivity and scientific character – persons responsible for the preparation of training materials in the field of combating corruption ensure that training materials comply with the requirements of the legislation of the Republic of Uzbekistan, advanced international standards and the results of scientific research on the rules of ethical behavior, as well as the theory and practice of combating corruption;

practical convenience – training materials, forms, methods of training employees of the executive office and structural divisions should have practical significance, based on real life examples, should also embody the level of understanding of the knowledge gained by employees, the possibility of applying the acquired knowledge and skills in solving specific practical problems and assignments;

continuity, consistency and systematic character – training materials in the field of corporate ethical conduct and anti-corruption rules represent a consistent and structural-logical system of training for employees of the executive office and structural divisions of the Combine. Training is carried out in stages based on general concepts, as well as methods from reality to insignificance, from simplicity to complexity, from initial to perfection, etc.;

popularity – it is required that the educational work should take into account the current knowledge and skills of employees of the executive office and structural divisions of the Combine, while it is necessary to form training materials in a language accessible to all employees;

differentiated/categorical approach – based on the results of the analysis of the position held by each employee in the organization of anti-corruption training in the executive office and structural divisions of the Combine, the tasks assigned to it and the functions performed by the employee, their propensity for corruption risks. Employees holding positions most

exposed to corruption risks additionally undergo special training in the direction of combating corruption;

continuous improvement of methods, techniques, as well as forms and content of training – is carried out using the most advanced and innovative achievements in the development of science and technology in the development of training materials, in the work of training employees, as well as in checking the level of assimilation of knowledge and skills by employees.

III. Priority tasks of training

5. When determining the forms and methods of training (corporate training, elimination of corruption risks and the formation of training materials in the field of combating corruption), the employees of the Combine, namely the persons responsible for training in the same area, should rely on the following priority tasks:

the essence of corruption risks, the negative impact of corruption on the life of society in various areas and directions, as well as the forms of its manifestation in the functions, tasks, powers and internal procedures of the Combine and the formation of a general idea of the features, causes, socially dangerous and harmful consequences;

Formation of a behavior model based on strict and unconditional observance of the current legislation of the Republic of Uzbekistan, the rules of corporate ethics and conduct established by the anti-corruption policy of the Combine and moral values, and internal regulations of the Combine;

Detailed familiarization of all employees of the executive office and structural divisions of the Combine with the principles, requirements and procedures for combating corruption, implemented at the plant;

As a result of corruption risks, the formation of the ability to identify and prevent conditions that give rise to corruption risks, the manifestation of intolerance to violations of the rules of ethics and behavior takes place.

IV. Persons responsible for development and implementation of the training program

6. The head of the training center of the Combine is responsible for the preparation of training plans for employees, the development and training of relevant training materials. The Combine's Human Resources Service is responsible for organizing, monitoring and controlling similar training at a high level.

7. The internal structure of the anti-corruption control of the Combine – the Compliance Control Service (hereinafter referred to as the Compliance Control Service) participates in the preparation of staff training plans, corruption risks and helps the training center in the development of training materials, coordinates training work in the field of combating corruption.

8. The personnel department of the Combine is responsible for observance of discipline, the duration of training, as well as for the collection, analysis and systematization of information and information related to it.

9. The Compliance Control Service and the Human Resources Service may engage third parties to prepare training materials and conduct training on the basis of agreements concluded with international or local organizations with certain experience.

V. Types and forms of training

10. Training should include the following training programs:

General training of all employees of the Combine in the field of combating corruption risks and manifestations of corruption;

General training of the Combine's employees in the rules of ethics and behavior;

special anti-corruption training for positions most exposed to corruption risk;

special training for employees responsible for formation, implementation and improvement of the anti-corruption system in the executive office and structural divisions of the Combine.

11. The above training in the general rules of ethics and conduct are mandatory for employees of all levels and positions of the Combine.

12. The general training of the employees of the Combine on the rules of ethics and conduct should be oriented for all employees and provide the opportunity to acquire the following new knowledge or repeat existing knowledge regarding the principles and rules of corporate ethical behavior implemented in the plant:

Legislation of the Republic of Uzbekistan on combating corruption, issues related to corruption risks, including the law of rights and obligations, requirements for corporate ethics and behavior, internal regulations regarding the sequence of actions of the Combine's employees to prevent corruption risks;

Knowledge of law enforcement practice in the field of identifying and assessing corruption risks, conflicts of interest and other anti-corruption requirements;

Skills in applying the acquired knowledge, including the ability to assess corruption risks in various areas of the Combine's activities, the ability to put into practice measures to eliminate the risks introduced in the plant;

To include corruption risks and corruption activities in general training materials, it is recommended to use the topics presented in Annex 1 to these instructions.

13. Workers of the Combine must pass tests aimed at checking the mastering of the studied material and understanding the results of general training and corporate ethics and behavior of employees, as well as the possibility of applying the acquired knowledge and skills in practice.

14. If the personnel of the Combine correctly answered at least 80% of the questions, it is considered that the rules of general training and the rules of corporate ethics and behavior have been successfully mastered. If an employee answers less than 80% of the questions correctly, he/she is allowed to retake the retest within 5 (five) working days from the date of the test.

15. Special training for positions most exposed to corruption risk is conducted independently (additionally) from general anti-corruption training.

16. The list of positions most exposed to corruption risk is formed by the Compliance Control Service of the Combine in accordance with the Risk Assessment Methodology.

17. For positions mostly exposed to corruption risk, special anti-corruption training should include information on:

ways to identify and minimize risks in specific functions and procedures that are most exposed to corruption risk;

forms and types of manifestations of risk in certain functions and procedures that are most exposed to corruption risk;

anti-corruption requirements specific to specific functions and procedures that are most exposed to various risks when interacting with third parties;

internal regulatory documents containing additional requirements and procedures applied in the performance of specific functions that are most exposed to corruption risk.

18. Special training for employees responsible for identifying corruption risks, the formation, implementation and improvement of the anti-corruption system at the plant is carried out at least once a year in the form of advanced training through the involvement of leading experts (including foreign ones), as well as participation in trainings organized by specialized authorized third parties.

19. Special training for employees responsible for identifying corruption risks, the formation, implementation and improvement of an anti-corruption system at the plant should include the study of advanced international methods and practice-based guidelines on changes in the legislation of the Republic of Uzbekistan, the formation of systems for eliminating corruption risks, the introduction of measures to prevent corruption.

20. The duration of advanced training courses and training courses specified in paragraphs 18 and 19 of these instructions must cover at least 50 (fifty) hours per year.

VI. Duration and frequency of training

21. Training within the framework of mandatory advanced training provided for by the legislation of the Republic of Uzbekistan and the internal regulations of the Combine is carried out regardless of trainings, joint conferences, meetings, symposiums with third parties.

22. Employees of the Combine at least once a year are trained in the field of corporate ethics and conduct, anti-corruption

23. Employees of the Combine more than once a year undergo anti-corruption training in the following cases:

if the employee occupies a position that is most exposed to corruption risks;

upon appointment and rotation to a position, a new position of a person is included in the list (register) of positions most exposed to corruption risks;

in case of detection of cases related to corrupt practices, as a result of corruption risks in the plant or an increased level of risks of the function/procedure being performed;

by order of the Chairman of the Board.

24. Employees newly hired or transferred to another position, within 30 (thirty) calendar days from the date of the newly hired or appointed to another position, must undergo anti-corruption training, as well as general training of the Combine's employees in the rules of corporate ethics and behavior.

When determining the date of study, the approved annual study schedule, the availability of vacancies in the formed group (for the form of full-time study) and the periods of study provided for in paragraphs 22-23 of this chapter and the need to comply with the frequency are taken into account.

The next general training on corruption risks and anti-corruption, as well as general training of the Combine's employees in the rules of corporate ethics and behavior are organized for all employees by the Combine's HR Service at least once a year.

25. In cases where an employee occupies a position most exposed to corruption risks, or when an employee is re-appointed to such a position, special training is carried out within the time frame established by the annual training schedule in this area.

26. The HR service of the executive office annually draws up a training schedule and ensures its approval by the chairman of the board before the twentieth day of December.

When drawing up a training schedule, employees take into account the terms of previous training.

The training schedule must indicate the course, name, date of training, as well as the positions assigned for training.

In accordance with the approved schedule, the responsible employees of the Human Resources Department provide official notification of the relevant personnel 10 (ten) working days before the start of training. If there is no possibility of training within the specified period (for full-time training, for example, a sick leave, such as a scheduled vacation, for a good reason), the employee must notify the Work Service no later than 5 (five) working days before the start of training, in an official form with staff to reschedule classes to another date in the prescribed manner.

VII. Control of academic discipline and storage of documentation

27. The Human Resources Service collects data on the training of the Combine employees in the rules of corporate ethics and behavior, corruption risks and anti-corruption and submits them to the Compliance Control Service of the Combine (internal anti-corruption control structure) with the conclusion of each quarter.

The Compliance Control Service analyzes the data received (including the academic discipline, topics that present difficulties for employees, and test questions) and ensures that the results of the analysis are included in continuous reports on monitoring corruption risks, the effectiveness of the system implemented at the plant of the anti-corruption system, as well as the adjustment (if necessary) training materials based on the results of the analyzes.

28. If an employee does not participate in the training courses assigned to him or in test trials without a valid reason within the established time limits after proper information, the head of the Human Resources Department warns the immediate supervisor of this employee about the application of appropriate disciplinary measures against such an employee.

29. The training schedule, selection lists, test results, other documents confirming the education of the employee by the employees of the Combine are kept by the Work Service for three years.

VIII. Final provisions

30. This Instruction will be revised when changes and additions are made to the legislation of the Republic of Uzbekistan, as well as to the internal regulatory documents of the Combine, or when international best practices for organizing training are changed. The Compliance Control Service is responsible for making appropriate changes and additions to this Instruction.

31. All employees of the Combine are personally responsible for strict observance of the provisions, principles and requirements of this Instruction, regardless of their position, seniority, position and other factors.

Appendix
to the Instructions for organization of training of employees of
Almalyk MMC JSC in the rules of corporate ethics and
conduct, also in the field of combating corruption

TOPICS
for training of employees of the Executive Office, as well as structural divisions
of Almalyk MMC JSC in the field of corporate ethics and behavior, as well as
countering corruption

Topic	Content
The essence of monitoring compliance and corruption risks	What is compliance? Concept about it; The concept of corruption risks, criteria and causes of its occurrence.
Impact of corruption risks and the nature of corruption	The presence of risks, its impact on the life of society; The concept of corruption, its forms and causes of occurrence, its relation in its system.
Formation of corruption risks	Goals and objectives of identifying corruption risks, Ways to identify them; Classification of corruption risks. Risk map.
Legal framework for combating corruption	The content and essence of legislative acts in the field of combating corruption; internal regulations of the Anti-Corruption Works; international practice in combating corruption.
The concept of conflict of interest	Prevention, detection and regulation of conflicts of interest in the Executive Office and structural subdivisions of the Combine; criteria affecting conflict of interest; The role of conflict of interest in financial risks;
Prevention of corruption risks in the Combine and its system, as well as ways to counteract corruption arising as a result of them.	Commitment of corruption risks in the Combine and its structural subdivisions, elements of their early detection, as well as comments on important measures to prevent them; Elements of corruption circumstances that may be allowed as a result of monitoring corruption risks, the essence of which is determined in the fight against them; Anti-corruption policy in the Combine and its system; Definition of tasks, obligations and powers of responsible employees and structural units in this area to identify corruption risks in the corruption process of mining operations in the Combine and its system; Obligations and powers of employees and structural units in the field of combating corruption; Use of administrative procedures and regulations. Prevention of administrative barrier and bureaucracy;

	Notification of corruption risks and corrupt practices (communication channels, instructions on the content of messages, principles for handling messages).
The main risks in corruption risks, financial transactions, risks in the process of interaction and procurement with counterparties, as well as other risks and corruption risks and typical corruption actions in the plant, as a result of which they are allowed	<p>The main types of corruption risks and corruption actions in the activities of the Combine and its system;</p> <p>Risks within the framework of control and permitting functions and procedures;</p> <p>Corruption risks when giving/receiving gifts and business hospitality; corruption risks associated with mutual relations with citizens, contractors and third parties;</p> <p>Corruption risks in the selection and recruitment of candidates for vacancies at the plant;</p> <p>corruption risks associated with procurement in the Combine and its system;</p> <p>corruption risks associated with the lease of buildings and structures;</p> <p>corruption risks associated with mutual cooperation and activities of structural units;</p> <p>corruption risks associated with competitions (auctions and tenders, purchases);</p> <p>corruption risks associated with the implementation of state control;</p> <p>other risks in the activity of the Combine.</p>
Responsibility for actions and omissions in preventing corruption risks. Types of liability for committing a corruption offense	<p>Disciplinary responsibility for actions of corruption risks;</p> <p>Disciplinary, administrative and criminal liability for the actions of admitting financial risks;</p> <p>Comments of judicial practice on corruption criminal cases of the Republic of Uzbekistan.</p>
Forming an intolerant (implacability) attitude of the employees of the Combine in relation to corruption cases committed as a result of corruption risks	<p>Public control of the activities of the employees of the Combine;</p> <p>Further development of legal consciousness and legal culture of the employees of the Combine;</p> <p>Formation of the principle of opinion of intolerance (implacability) and behavior (introduction of the principle of “vaccination of good faith”) in relation to various forms and types (manifestations) of corruption in the minds of employees).</p>