ANTI-CORRUPTION POLICY

"UNITED INVESTMENTS AND CONSULT" LLC

Chapter 1. General Provisions

1. This Policy reflects the commitment of "UNITED INVESTMENTS AND CONSULT" LLC (hereinafter referred to as UIC) to high ethical standards with the aim of enhancing the level of anti-corruption culture among both employees and society at large. It also aims to reject and prevent UIC employees from engaging in corrupt practices in their activities.
2. This Policy has been developed in strict accordance with the requirements of the current legislation of the Republic of Uzbekistan, taking into account the recommendations of international organizations and leading global practices in the field of combating corruption, including the requirements and recommendations of the International Standard ISO 37001:2016 "Anti-Bribery Management Systems – Requirements and Guidance for Use."
3. The main goals of combating corruption at UIC include:
   - Raising legal awareness and legal culture among UIC employees, fostering an intolerant attitude towards corruption in society.
   - Implementing measures to prevent corruption in all areas of UIC's activities.
   - Timely identification, prevention of corrupt offenses, elimination of their consequences, causes, and conditions conducive to them, ensuring the principle of inevitable responsibility for committing corrupt offenses.
4. To achieve these main goals, this Anti-Corruption Policy of UIC has been adopted, which is a fundamental internal document defining key principles and requirements aimed at preventing and combating corrupt offenses in the activities of UIC.
5. The requirements of this Policy apply to all employees of UIC, regardless of their position and functions.
6. Any person entering employment at UIC must read and adhere to the provisions of this Policy.
7. For the purposes of this Policy, the following key concepts and terms are used:
   - Close relatives – individuals related by blood or marriage, including parents, blood and stepbrothers and sisters, spouses, children, including adopted ones, grandparents, grandchildren, as well as parents, blood and stepbrothers and sisters of spouses.
   - Good-faith report of a violation of anti-corruption requirements – a report by a UIC employee or another person through available communication channels about the commission (attempted commission) of a corrupt offense by a UIC employee, where such employee/person genuinely believes that the information provided is justified.
   - Signs of business hospitality – expenses incurred by third parties for or in the interests of UIC employees, related to the establishment and/or

maintenance of cooperation, carried out in the course of activities, including expenses of third parties for business dinners, transportation expenses, accommodation expenses, entertainment, etc.

- Contractor/business partner – any legal or natural person with whom UIC has entered into contractual relations, excluding employment relations.
- Conflict of interest – a situation where the personal interest (direct or indirect) of a UIC employee affects or may affect the proper performance of their official duties, giving rise to or potentially giving rise to a conflict between the personal interest of the employee and the interests of UIC.
- Corruption – the unlawful use by an individual of their official or service position with the aim of obtaining material or non-material benefits for personal interests or the interests of other persons, as well as the unlawful provision of such benefits.
- Corrupt actions – direct or indirect, personal or through third parties, the receipt, demand, extortion, offer, promise, or giving of a bribe by a UIC employee, i.e., money, securities, other property, services of a material nature, other property rights, for action or inaction on the part of the employee in the interests of the bribe-giver, intermediation in the giving and/or receiving of a bribe, receipt of payments to facilitate formalities, the unlawful use by an individual of their service position with the aim of receiving a bribe and for other unlawful purposes.
- Corruption offense – an act with signs of corruption for which the legislation of the Republic of Uzbekistan provides for liability.
- Corruption risk – the risk of UIC employees or third parties acting on behalf of UIC committing corrupt actions and/or in its interests.
- Personal interest of an employee – the possibility for a UIC employee, close relatives, or affiliated persons to receive personal benefits (personal, social, material, financial, political, and other commercial or non-commercial interests) in the form of money, material and non-material values, other property, benefits, and advantages that may affect the proper performance of their official duties.
- Payments to facilitate formalities – money, property, property rights, services, and other material or non-material benefits that are unlawfully provided to expedite or facilitate the execution of standard procedures or actions not provided for by relevant legislative and regulatory norms.
- Employee/staff – director and deputy directors, chief engineer, head (leader) of a structural unit, and any other person who has entered into employment relations with UIC.
- Related persons – individuals with whom a UIC employee participates in the charter capital of commercial organizations.
- Anti-Corruption System – a set of measures to prevent corrupt offenses under the current applicable legislation and internal acts, ensuring a high level of professional and ethical conduct by UIC employees.

Chapter 2. Key Principles of Anti-Corruption

8. UIC implements an anti-corruption system based on the following principles:
    - **Legality:** Measures to counter corruption at UIC are implemented in accordance with the requirements of the legislation of the Republic of Uzbekistan and strictly in line with UIC's established internal acts.
    - **Zero Tolerance for Corruption:** UIC rejects any forms and manifestations of corruption in all aspects of its activities. UIC employees are prohibited from directly or indirectly engaging in activities that may lead to the emergence of a corruption risk.
    - **Openness and Transparency:** Informing UIC employees, contractors, and the wider public about the adopted and implemented measures to counter corruption within the UIC system.
    - **Preventiveness, Systematic Approach, and Integration of Anti-Corruption Measures:** UIC prioritizes the implementation of preventive measures aimed at eliminating the causes and conditions conducive to corrupt actions and the realization of corruption risks. Implemented anti-corruption measures and procedures are proportionate to the level of identified risks and integrated into the anti-corruption system, covering all functions and directions of UIC's activities.
    - **Inevitability of Accountability for Committing Corruption Offenses:** UIC employees who commit corruption offenses, regardless of their status and position, will be held accountable in accordance with UIC's internal acts and applicable legislation.
    - **Use of Technological Advances:** UIC strives to incorporate the latest technological advancements in building its anti-corruption system, including integrated information systems.
    - **Direct Access to Leadership:** Every UIC employee can freely address the UIC director with credible and substantiated information about the commission of a corruption offense for appropriate action.
    - **Interaction with Civil Society Representatives:** In fulfilling its responsibilities, UIC involves representatives of civil society to independently monitor UIC activities on a fair, objective, and independent basis.
    - **Continuous Improvement of the Anti-Corruption System:** Based on monitoring and control results of the anti-corruption system and the realization of corruption risks, UIC takes measures for continuous improvement of the effectiveness of the anti-corruption system.

Chapter 3. Elements of the Anti-Corruption System

9. Adhering to the principle of "zero tolerance" for corruption, all UIC employees are strictly prohibited from directly or indirectly, personally or through intermediaries, participating in any corrupt actions. This includes the receipt,

demand, extortion, offer, promise, or giving of money, securities, other property, services of a material nature, and other property rights for actions or inactions by an employee in the interests of the bribe-giver, receiving payments to facilitate formalities bypassing established rules, and the unlawful use of their official position for the purpose of receiving a bribe and other unlawful purposes.

10. The key elements of the anti-corruption system at UIC include:

- **Existence of Fundamental Internal Acts:** The foundation of UIC's anti-corruption system lies in principles and requirements reflected in:
    - This Anti-Corruption Policy,
    - Corporate Code of Ethics,
    - Regulation on Conflict of Interest Management at UIC.
- **"Tone from the Top" - Leadership Example:**
    - The UIC leadership and heads of UIC structural units must set an example of honest, fair, and independent behavior in their interactions with subordinates, individuals, and legal entities.
    - The director, deputy directors, and heads of structural units demonstrate leadership in building and implementing an effective anti-corruption system by:
        - Facilitating the implementation of effective anti-corruption measures and procedures in risk-prone functions (areas) of UIC's activities, including developing an anti-corruption action plan and monitoring its implementation.
        - Demonstrating personal examples of ethical behavior and compliance with anti-corruption laws and internal acts within the scope of their duties, thereby instilling in UIC employees an intolerant attitude towards all forms and manifestations of corruption.
- **Identification and Assessment of Corruption Risk:**
    - UIC conducts the identification and assessment of the corruption risk inherent in its activities due to the specificity of UIC's functions, organizational structure, interaction with society and other entities, as well as other external and internal factors in accordance with the developed methodology for assessing corruption risk.
    - In the process of identifying and assessing corruption risk, all directions of UIC's activities are analyzed to determine functions most susceptible to corruption risk, and existing types of anti-corruption control and procedures are analyzed in terms of their sufficiency to reduce identified risks. In addition to the Internal Anti-Corruption Control Department of UIC, leaders of relevant UIC directions participate in the risk identification and assessment process.
    - Considering UIC's "zero tolerance" for corrupt actions, the organization acknowledges the need to manage corruption risk regardless of the probability of its occurrence and the degree of impact.
    - The assessment of corruption risks is conducted at least once a year. The results of the corruption risk assessment are reviewed by the UIC director

and, together with anti-corruption measures and procedures minimizing identified risks, are reflected in UIC's anti-corruption plans.

- **Persons and Units Responsible for Combating Corruption:**

d) Internal Anti-Corruption Control Department:

To establish an effective anti-corruption system at UIC, a separate structural unit has been formed - the Internal Anti-Corruption Control Department of UIC. This department is responsible for the process of forming and controlling the anti-corruption system. It operates directly under the supervision of the UIC director and carries out its activities in accordance with the Regulation on the Internal Anti-Corruption Control Department.

When conducting activities to counter corruption, the UIC Human Resources Department is responsible for the systematic and timely collection, analysis, and updating of information about the close relatives of employees and related persons, as stipulated in the Regulation on Conflict of Interest Management at UIC, and in accordance with the norms of the legislation of the Republic of Uzbekistan.

Additionally, the Internal Anti-Corruption Control Department reviews information received from the Human Resources Department regarding conflicts of interest among UIC employees. It makes decisions on resolving conflicts of interest (if not previously resolved) or assesses the sufficiency/insufficiency of measures taken to resolve the identified conflict of interest. The department also considers issues related to compliance with ethical norms established at UIC. In managing conflicts of interest, the Human Resources Department and the Internal Anti-Corruption Control Department are guided by the Regulation on Conflict of Interest Management at UIC.

e) Anti-Corruption Measures Minimizing Identified Corruption Risks:

UIC implements a comprehensive system to counter corruption, covering both the general control environment and anti-corruption controls and procedures in risk-prone directions of UIC's activities/functions.

UIC seeks to ensure the effectiveness of anti-corruption control and procedures, including their proportionality to the level of identified risks, clarity, and transparency for UIC employees. The implemented measures and introduced control and procedures against corruption are reflected in the UIC Anti-Corruption Action Plan and are enshrined in corresponding internal acts.

f) Information, Communication, and Consultation:

To reduce corruption risks and increase public awareness of UIC's anti-corruption principles and requirements, this Policy and basic information about implemented anti-corruption measures/campaigns are posted on the official website on the Internet.

In addition, UIC makes every reasonable effort to inform and explain the norms of current anti-corruption legislation and implemented anti-corruption principles and requirements to UIC employees and other interested parties through:

- Conducting regular and systematic training of UIC employees on the basics of counteracting corruption, not less than once a year, along with mandatory familiarization with this Policy and other internal anti-corruption acts. Additional anti-corruption training programs are established for positions with increased corruption risk. Information about conducted training/sessions is stored in the UIC Human Resources Department in accordance with the established legislative procedure.
- Conducting anti-corruption campaigns using thematic audio and video clips and other informational materials aimed at raising awareness among UIC employees and citizens about the implemented measures to counter corruption and forming their intolerant attitude towards corruption.
- Providing accessible communication channels for reporting facts or suspicions of UIC employees committing corruption offenses, corruption risks, etc.
- Consulting UIC employees in case of questions related to the application of the provisions of this Policy or the implementation of anti-corruption measures and procedures by the Internal Anti-Corruption Control Department.
- Including anti-corruption provisions in the employment contracts of UIC employees.

g) Implementation of Internal Anti-Corruption Control Department's Activities:

The Internal Anti-Corruption Control Department actively propagates anti-corruption behavior in accordance with the approved plan. This includes informing contractors about the adopted anti-corruption principles and requirements, incorporating specific anti-corruption conditions into contracts, and more.

h) Monitoring, Control, and Reporting:

The Internal Anti-Corruption Control Department conducts continuous monitoring and evaluation of the effectiveness, sufficiency, and proportionality of implemented anti-corruption procedures at UIC. Based on the monitoring results, appropriate measures are taken to improve the anti-corruption system at UIC.

Monitoring and control procedures in UIC include:

- Analysis of the impact of changes in UIC's functions, activities, organizational-functional structure, and other external and internal factors on the anti-corruption system. This ensures its compliance with the requirements of current legislation.
- Selective monitoring of internal processes and functions at UIC to identify ineffective controls and procedures for correction. This ensures the reliability and effectiveness of the anti-corruption system in accordance with the approved plan.

- Monitoring UIC employees' compliance with anti-corruption requirements during internal and/or external inspections.
- Control over the timely and proper implementation of anti-corruption measures assigned to the Internal Anti-Corruption Control Department.

The results of monitoring and control activities are reflected in quarterly reports for the UIC director.

i) Reacting to Violations and Holding Offenders Accountable:

Adherence to this Policy and compliance with UIC's anti-corruption procedures is the responsibility of each employee in the performance of their duties. Employees bear personal responsibility for violating established requirements and procedures.

Employees who breach UIC's anti-corruption principles and requirements are subject to disciplinary, administrative, or criminal liability according to the grounds and procedures provided in UIC's internal acts and the legislation of the Republic of Uzbekistan.

Employees are obligated to inform their supervisor and the Internal Anti-Corruption Control Department about any attempts by individuals to persuade them to commit corruption offenses and about any known instances of corruption offenses committed by other employees.

Given the zero-tolerance principle towards corruption, UIC conducts internal investigations into every substantiated suspicion of UIC employees committing corruption offenses. These investigations follow the procedures outlined in UIC's internal acts and comply with the requirements of the legislation of the Republic of Uzbekistan. Employees who violate anti-corruption legislation and/or UIC's anti-corruption principles, requirements, and procedures, regardless of their position, length of service, and other factors, are subject to liability as per the grounds stipulated in the legislation of the Republic of Uzbekistan and UIC's internal acts.

In case of detecting corruption offenses, UIC analyzes the causes and opportunities for their commission and continually improves the anti-corruption system.

UIC collaborates with law enforcement and state authorities to identify and investigate corruption offenses.

Chapter 4. Main Directions in Combating Corruption

§ 1. Conflict of Interest Management

UIC employees must honestly and conscientiously fulfill their job duties, refrain from using their official position and/or UIC property with consideration for personal interests, and avoid situations that may lead to a conflict of interest.

A conflict of interest arises when UIC employees have a personal interest that affects or may affect the proper and impartial performance of their duties, including the objective decision-making, and has the potential to harm the rights, legitimate interests, property, and/or reputation of UIC.

UIC employees are required to disclose information about their personal interests that may lead to a conflict of interest when applying for a job, advancing in their career, on an annual basis, and as situations/circumstances arise. The process of disclosure by UIC employees of information about a conflict of interest and its resolution is regulated by the Regulations on Conflict of Interest Management in UIC.

§ 2. Gifts and Business Hospitality

UIC employees are prohibited from accepting any gifts or business hospitality, incentives in the form of loans, guarantees, endorsements, rewards, financial assistance in the form of cash or equivalents, securities, or other services from individuals and legal entities in connection with the performance of their official duties.

Any gifts, regardless of the amount, received by UIC employees as part of official delegations, at official events including abroad, must be transferred to the ownership of UIC.

UIC employees may give gifts to other UIC employees only on personal occasions (birthdays, the birth of a child, etc.) unrelated to the performance of their official duties and are considered gifts related to the individual.

When giving such gifts, the following requirements must be observed:

- Gifts must be given in the presence of other UIC employees;
- The giving of the gift must be accompanied by a congratulatory speech clearly expressing the event that prompted the gift;
- The total value of the gift (including all taxes and fees) cannot exceed 5 (five) times the basic calculated amount established by legislation on the date of the gift.

To avoid any doubts, gifts and other material values listed in paragraph 16 of this Policy, received in connection with any holidays (including, but not limited to, birthdays, the birth of a child, etc.) from employees of other government authorities and organizations, partners and counterparties, other individuals and legal entities not listed in paragraphs 14 and 15 of this Policy, are prohibited.
The giving of gifts at international conferences, symposiums, and other business (official) meetings on behalf of UIC is carried out by order of the UIC director.
In case of any doubts about the legitimacy of accepting a gift, UIC employees should seek advice from the Internal Anti-Corruption Control Department.

§ 3. Personnel Selection, Career Advancement, Material Incentives

The process of selecting, certifying, and evaluating the performance of UIC employees, including the payment of bonuses, the establishment of allowances, and other types of rewards, is transparent, equal, and objective for all employees and complies with the fundamental principles and requirements of this Policy.
UIC should develop procedures and criteria for evaluating key performance indicators of UIC leaders, as well as heads of structural units of UIC, based on which their bonuses are awarded. These indicators are objective, transparent, and available for review by UIC employees.

§ 4. Interaction with Contractors and Third Parties

UIC does not engage suppliers, contractors, and other third parties to make any payments and/or take actions that contradict the principles and requirements of this Policy and create a risk of corruption.
In its relations with contractors, UIC adheres to the principles of legality and transparency in conducting its activities. UIC ensures a fair, open, and transparent process for selecting suppliers, contractors, and other counterparties based on the use of objective selection criteria, as well as a transparent procedure for determining the cost of acquired products/works/services, regulated by the current legislation of the Republic of Uzbekistan and UIC's internal acts.
When interacting/cooperating with a UIC contractor, it:

- Conducts a reliability check of the potential contractor, including checking for past corruption offenses and the absence of conflicts of interest with UIC employees in accordance with UIC's internal acts and within the framework of the legislation of the Republic of Uzbekistan;
- Informs the potential contractor (winner of the selection, competition, tender, and direct procurement contractor) about its anti-corruption principles and requirements by including special anti-corruption conditions in the contract.

§ 5. Charitable and Sponsorship Activities

UIC may both receive and provide charitable and sponsorship assistance in cases established by law. When receiving such assistance, UIC takes all possible measures to prevent conflicts of interest, ensure the effective and targeted use of funds for purposes established by law and/or contract, and disclose information about charitable and sponsorship activities on its official website on the World Wide Web.

§ 6. Anti-Corruption Expertise of Internal Acts

During the legal expertise of internal acts, an expertise is also conducted to prevent the emergence, identify, and exclude corruption factors from documents that create the possibility of committing corruption offenses.

§ 7. Consultation for UIC Employees

In case UIC employees have any questions related to the requirements of the current legislation on countering corruption, provisions of this Policy, or other anti-corruption measures and procedures at UIC, they may seek advice from the Internal Anti-Corruption Control Department.

Chapter 5. Reporting on Corruption Offenses

UIC employees and other individuals, when having doubts about the legality and/or ethics of UIC employees' actions, substantiated suspicions regarding alleged or committed corruption and other violations, may openly report them through available communication channels at UIC.
Within its powers and capabilities, UIC ensures the confidentiality of the person who provided accurate information about the violation (except in cases provided by the legislation of the Republic of Uzbekistan).
UIC protects the interests of its employees and ensures that no acts of retaliation, including dismissal, demotion, discrimination, harassment, or persecution, will be taken against those employees who conscientiously reported suspicious behavior or possible violations of anti-corruption requirements of this Policy by another UIC employee.
Reports of corruption offenses can be provided through the following communication channels:

- By phone: +998 93-456-44-84;
- By email: anticor@uinvest.uz

All reports received through UIC communication channels are objectively and promptly considered by the Internal Anti-Corruption Control Department in accordance with the legislation of the Republic of Uzbekistan and UIC's internal acts.

Chapter 6. Procedure for Review and Amendment

This Policy is subject to review and correction in the following cases:

- In the event of changes in the legislation of the Republic of Uzbekistan in the field of countering corruption, which necessitate a review of existing anti-corruption policies and procedures at UIC;
- Upon identification of ineffective anti-corruption controls and procedures and the need for improvement of measures aimed at preventing and countering corruption in UIC's activities;
- In the event of changes in the organizational structure of UIC and/or features of UIC's performance of its tasks and functions, etc.