



OUR ANTI-BRIBERY AND CORRUPTION POLICY

Our anti-bribery and corruption policy is to instil and maintain a culture of compliance with anti-bribery and corruption measures and procedures in line with the law of the Republic of Uzbekistan and with FATF and OECD guidelines.

Our policy applies to all employees as well as any agents, contractors, representatives or other parties acting on the company's behalf, and will, where appropriate, include clauses to this effect in relevant contracts.

Ultimate responsibility for overseeing the implementation and review of our policy lies with our Senior Leadership Teams.

Our policy

In the business world, bribes are generally used to obtain, retain or direct business. This may involve sales processes, such as tendering and contracting, or it may involve administrative tasks such as licences, customs, taxes or import/export matters. A bribe could be:

- The direct or indirect promise, offering, or authorization, of anything of value
- The offer or receipt of a kickback, loan, fee, reward or other advantage, tangible or intangible
- The giving of aid, donations or voting designed to exert improper influence

Our policy prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated or whether they are a public official or body or private person or company by any individual employee, contractor, agent or other person acting on the company's behalf.

Dealings with third parties

We are committed to communicating and promoting compliance with our Anti-Bribery and Corruption policy to all third parties, that is people who act on our behalf such as agents, contractors, suppliers and joint-venture partners. These third parties are expected to adhere to our policy and in the event of a breach, the company can immediately terminate the relevant contract.

The Law

Under the laws and regulations of the Republic of Uzbekistan, the relevant offences are to be found in Law No. ZRU-419 "On Combating Corruption".

The duty of the company

We have established an Anti-Bribery and Corruption function under the Head of Internal Audit and Compliance with procedures to enable suspicions to be reported and records to be kept.

The function includes maintaining a Gifts and Hospitality Register of all gifts and hospitality received from or given to third parties by our employees.

Facilitation payments

These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has a legal or other entitlement. Such payments are bribes and as such are prohibited. If an employee is asked to make a payment on the company's behalf, they should always be aware of what the payment is for and whether the amount requested is proportional to the goods or services provided. The employee should always ask for a receipt which details the reasons for the payment. If an employee has any suspicions, concerns or queries, he/she should raise these with the Head of Internal Audit and Compliance.

Political contributions

While we shall always co-operate with governments and other official bodies in the development of policy and legislation that may affect our legitimate business interests or where we can provide specialist expertise, we have a strict policy of not making donations to any political parties, organizations or individuals involved in politics.

Trading in influence

Our policy prohibits the offering or giving of an improper advantage to a third party in exchange for that party trying to influence the conduct of someone else.

If the company engages lobbyists or agents to influence a public office or political decision, the lobbyist or agent in contact with the decision makers must be open about his assignment for the company and his fee must be reasonable based on the service provided.

Charitable contributions and sponsorship

As part of our Corporate and Social Responsibility activities, we may support local charities or provide sponsorship to sporting or cultural events. Any such contributions or sponsorships must be properly documented and records maintained.

Implementation and training

All employees must be familiar with this Policy and it is the responsibility of the Head of Internal Audit and Compliance in conjunction with HR to oversee training within the company. Certain departments and functions will require more extensive training than that required for employees in general.

All new employees shall be made aware of our Anti-Bribery and Corruption policy and with our Gifts and Hospitality Guidelines.

Reporting procedures

It is the responsibility of each employee and third party to comply with both the letter and spirit of our Anti-Bribery and Corruption Policy. If an individual has any suspicions, concerns or queries about any

conduct he/she believes may violate this policy, he/she must report the activity to the Head of Internal Audit and Compliance.

Any such report will be entirely confidential. No employee or third party is discriminated against in any way as a result of reporting a concern in good faith.

Monitoring, audit and review

The Head of Internal Audit and Compliance shall devise and implement all internal control procedures deemed necessary and will, at regular intervals, make arrangements for an annual audit of compliance with this policy, the results of which will be published in our Annual Corporate Responsibility Review.

Internal Audit and Compliance will also update the policy and procedure in the context of performing an annual assessment of business partnership risk and transaction risk.