

ANTI-CORRUPTION POLICY

JSC "Uzbekistan Technological Metals Plant"

Chapter 1. General Provisions

1.1. Anti-Corruption Policy

1.2. The anti-corruption policy of "Uzbekistan Technological Metals Plant" Joint Stock Company (hereinafter referred to as the Company) aims to enhance the anti-corruption culture among employees and within the Company as a whole. This policy reflects the commitment of the Company's employees to high ethical standards, an intolerance for corrupt offenses, and the prevention of their commission in the activities of the Company's central office and structural divisions.

1.2. Basis of the Policy

This Policy was developed based on the Laws of the Republic of Uzbekistan "On Combating Corruption," "On State Civil Service," and "On Conflict of Interest," as well as decrees and resolutions of the President of the Republic of Uzbekistan:

Decree No. PF-5729 of May 27, 2019, "On Measures for the Further Improvement of the Anti-Corruption System in the Republic of Uzbekistan."

Decree No. PF-6013 of June 29, 2020, "On Additional Measures for the Improvement of the Anti-Corruption System in the Republic of Uzbekistan."

Decree No. PF-6257 of July 6, 2021, "On Measures to Create an Atmosphere of Intolerance to Corruption, Drastically Reduce Corruption Factors in State and Public Administration, and Expand Public Participation in This Process."

Resolution No. PQ-5177 of July 6, 2021, "On Additional Measures for the Effective Organization of Activities in the Sphere of Combating Corruption."

Resolution No. PQ-147 of April 21, 2025, "On Measures to Ensure the Independence and Enhance the Effectiveness of Internal Anti-Corruption Units of State Bodies and Organizations."

Resolution of the Cabinet of Ministers No. 595 of October 14, 2022, "On Additional Measures to Ensure Compliance with Ethical Rules by State Civil Servants."

This policy also takes into account the recommendations of international organizations in the field of anti-corruption and leading international practices, including the requirements and recommendations of the international standard ISO 37001:2025.

1.3. Main Goals of Anti-Corruption

The main goals of the anti-corruption policy within the Company are:

Eliminating corruption: To eliminate corruption in the Company's structural divisions.

Fostering intolerance: To foster an attitude of intolerance towards corruption by raising the legal awareness and culture of employees.

Implementing preventive measures: To implement measures to prevent corruption in all areas of activity within the Company's structural divisions.

Timely detection and prosecution: To ensure the timely detection and suppression of corruption offenses, the elimination of their consequences, and the

underlying causes and conditions, while upholding the principle of inevitable accountability for corrupt actions.

The Company's management is committed to complying with the requirements of the anti-corruption management system and to continuously improving it.

1.4. Scope of the Policy

The requirements of this Policy apply equally to all employees of the Company's executive office, regardless of their position or function.

The scope of the Company's "anti-corruption management system" (hereinafter referred to as ACMS) covers the "**Management of Mineral Extraction and Processing**".

1.5. Policy Purpose

As an internal document, this Policy serves as the foundation for achieving the aforementioned goals. It defines key requirements and principles aimed at preventing and eliminating corruption offenses within the Company's structural divisions.

1.6. Employee Familiarization

Any person hired by the Company must read and sign this Policy to confirm their understanding and commitment to abide by all of its rules and requirements.

1.7. Key Terms and Definitions

For the purposes of this Policy, the following key concepts and terms are used:

Employee: A natural person who has entered into an employment relationship with the Company based on an employment contract.

Related Parties: Close relatives of a Company employee, as well as a legal entity in whose charter capital the employee's close relatives own shares or stakes; or a legal entity in which the employee's close relatives hold the position of a manager or a member of the management body.

State Bodies and Institutions: State authorities and administration, citizen self-government bodies (including societies, services, agencies, centers, and other departments) and their structural divisions, as well as legal entities under direct or indirect state control.

International Events: Events organized and held on behalf of a state body with the participation of its official representatives, as well as representatives of foreign states and international organizations, for the purpose of establishing mutual cooperation, developing ties, and exchanging experience. This includes, in particular, events related to a visit by a delegation of the Republic of Uzbekistan to a foreign country or a visit by a delegation of a foreign country to the Republic of Uzbekistan.

Official Events: Events organized on behalf of a state body based on its assigned tasks and functions with the participation of its official representatives, aimed at achieving specific goals (official reception, ceremony, meeting, conference, seminar, briefing, symposium, presentation, round table, and other events).

Business Trip: The assignment of a state civil servant for a specified period outside their permanent place of work (within the territory of the Republic of Uzbekistan or abroad) to perform official duties and assignments based on an order (decision, directive) from the head of a state body.

Counterparty: Any legal or natural person who has entered into a contractual relationship with the organization (excluding employment relationships).

Corruption: The illegal use by a person of their official or service position to obtain material or non-material benefits for themselves or in the interests of other persons, as well as the illegal provision of such benefits.

Corruption Risk: The likelihood of corrupt acts being committed by employees or third parties on behalf of or in the interests of the organization.

Corrupt Acts: The direct or indirect receipt of material benefits by a Company employee, personally or through third parties, for an action or inaction in the interests of a briber. This includes receiving, demanding, extorting, offering, or giving money, securities, other property, and property rights, property services, as well as giving or receiving a bribe and/or acting as a mediator in this, receiving "facilitation payments" (bribes), and any other illegal use of official duties for unlawful purposes.

Corruption Offense: An action or inaction that has signs of corruption and for which liability is established by the legislation of the Republic of Uzbekistan.

Internal Anti-Corruption Control Structure: The Compliance Service.

Anti-Corruption System: A set of measures aimed at preventing corrupt acts, violations of the legislation of the Republic of Uzbekistan in the field of anti-corruption and the Company's internal anti-corruption documents, as well as at ensuring that the activities of the Company's employees are carried out at a high professional and ethical level.

Cronyism (A form of favoritism based on friendly ties): The use of power and/or authority to grant illegal privileges to friends or trusted individuals.

Official: A person appointed or elected on a permanent, temporary, or special basis who performs the functions of a representative of authority or exercises organizational-administrative, economic duties in state bodies, citizen self-government bodies, enterprises, institutions, and organizations regardless of the form of ownership and is authorized to perform legally significant actions, as well as a person who performs these functions in an international organization or in a legislative, executive, administrative, or judicial body of a foreign state.

Conflict of Interest: A situation in which the personal (direct or indirect) interest of a Company employee influences or may influence the proper performance of their official or service duties, and a contradiction arises or may arise between personal interest and the rights and legitimate interests of citizens, organizations, the Company, or the state.

Parochialism: Conducting business exclusively in the interests of local communities. In this case, a person is hired, rotated, or appointed to a position without taking into account compliance with qualification requirements, solely based on their lineage (belonging to a well-known family or clan recognized by society) or the official position of their close relatives.

Nepotism (Cronyism, kinship, a form of favoritism based on family ties): The use of power and/or influence to grant illegal advantages to one's close relatives or friends, as well as the unjustified accrual of rewards, hiring, and appointment of relatives and friends to positions to the detriment of the Company's interests.

Facilitation Payments: Illegally provided monetary funds, property, property rights, services, and other material and non-material benefits not provided for by current legislation, regulatory norms, and rules, with the aim of ensuring or accelerating the fulfillment of established procedures or actions related to standard administrative processes.

Clanism: The personal interest of a Company employee expressed in a subjective, privileged, and biased attitude towards third parties based on belonging to the same clan, dynasty, or common ancestors.

Favoritism: A Company employee giving priority to the interests of one person and/or group of people over others, manifested in a violation of established procedures for staff selection and placement, promotion, issuing bonuses, presenting for state awards, providing vacations, sending to sanatoriums or foreign trips, considering appeals, as well as when drawing up work and duty schedules.

Charity (Charitable Assistance): Voluntary gratuitous assistance from legal and natural persons (donors), expressed in the transfer to the Company on a gratuitous basis or on preferential terms of material or non-material values, including monetary funds, performing certain works for it, providing services, or providing other types of support for charitable purposes.

International Organization: Any international organization created by states, governments, or other international organizations, regardless of its organizational form and powers, including, for example, regional economic integration organizations.

Sponsorship (Sponsorship Assistance): Assistance expressed in the provision by legal and natural persons (sponsors) to the Company (sponsored institutions) of property, including monetary funds, providing services, performing work, and other types of support for charitable purposes, as a result of which mutual obligations to the sponsor arise in the Company's institutions.

Patronage: The protection or patronage of an employee by another employee who holds a higher position, expressed in the creation of favorable working conditions and support for them.

Close Relatives: Persons who are related or closely connected, namely: parents, biological and adopted brothers and sisters, children (including adopted), spouses, as well as the parents of a spouse, their biological and adopted brothers and sisters, and their children.

Chapter 2. Key Principles of Anti-Corruption

2.1. Principles of the Anti-Corruption System

The Company's structural divisions implement the anti-corruption system based on the following principles:

Legality: The Company's structural divisions implement anti-corruption measures in accordance with the legislation of the Republic of Uzbekistan, with due consideration for recognized global practices in combating corruption within state bodies, and in line with the Company's established internal documents.

Intolerance for Corruption: The Company's structural divisions take an uncompromising stance against any form or manifestation of corruption in all areas of

their work. Employees are prohibited from directly or indirectly engaging in activities where there may be a corruption risk.

Openness and Transparency: The Company informs its employees, counterparties, and the general public about the anti-corruption measures that have been adopted and are being implemented within its system.

Preventive and Systematic Measures: The Company's structural divisions prioritize the implementation of preventive measures aimed at eliminating the causes and conditions that contribute to corrupt acts and the emergence of corruption risks. Anti-corruption measures and procedures are proportionate to the identified risks and are integrated into a single anti-corruption system that covers all functions and activities of the Company.

Inevitable Accountability for Corruption Offenses: Employees who commit corruption offenses, regardless of their status or position, are held accountable in accordance with the Company's internal documents and current legislation.

Use of Technological Advancements: When creating the anti-corruption system in its central office structural divisions, the Company seeks to use the latest scientific achievements, including integrated information systems.

Direct Appeal to Management: Every employee within the Company's system who has reliable and substantiated information about committed corruption offenses can freely contact the head of the organization or the Compliance Service to take established measures.

Interaction with Civil Society Representatives: When performing their assigned functions, the Company's central office structural divisions involve representatives of civil society to conduct independent oversight of the Company's activities based on integrity, objectivity, and independence.

Continuous Improvement of the Anti-Corruption System: Based on the results of monitoring, control, and corruption risk management, the Company's central office structural divisions continuously take measures to improve the effectiveness of the anti-corruption system within the Company.

Chapter 3. Main Directions of Anti-Corruption

3.1. Conflict of Interest Management

3.1.1. Employees of the Company's structural divisions must be guided by the principles of integrity and honesty when performing their official duties and representing the Company's interests. They should avoid using their official position and the assets of the Company's system enterprises for personal gain and prevent situations that could lead to a conflict of interest.

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3.1.2. Obligation to Inform

In the event of a conflict of interest, an employee of the Company must immediately notify their supervisor or the compliance service in writing.

3.1.3. Declaration of Income and Assets

To prevent conflicts of interest, Company employees are required to submit a declaration of their income and assets within the established timeframes and in the prescribed manner.

3.1.4. Disclosure Procedure

Upon hiring, transfer to a different position, and annually or when relevant circumstances arise, employees of the Company's system are obligated to disclose information about their personal interests that lead to or may lead to a conflict of interest.

The process of disclosing (declaring) and resolving information about a conflict of interest by the Company's structural divisions is regulated by the "Regulation on Conflict of Interest Management" within the Company's system.

3.2. Receipt of Business Gifts and Hospitality

3.2.1. All employees of the Company are prohibited from accepting from individuals and legal entities in connection with the performance of their official duties:

- Property of any material value.

- Gratuitous services.

- Gifts or signs of hospitality during work.

- Incentives in the form of loans, guarantees, sureties, bonuses.

- Financial assistance in the form of monetary funds or their equivalent, securities.

3.2.2. Permitted Gifts and Conditions for Acceptance

A Company employee may accept gifts during business trips outside the Republic of Uzbekistan, as well as at international and other official events held both abroad and in the territory of the Republic of Uzbekistan.

However, the gift must comply with the following requirements:

Compliance with Legislation: It must comply with the legislation of the Republic of Uzbekistan, the internal regulatory documents of the Company, and the requirements of this Regulation.

Cost Limit: Its value must not exceed 4 (four) basic calculated values.

Voluntariness: The gift must be voluntarily provided by the donor in connection with a specific international or other official event.

Transparency: The gift must be accepted by the public servant openly and publicly.

No Damage to Reputation: It must not damage the reputation.

No Conflict of Interest: The gift should not lead to a conflict of interest or create corruption risks for JSC "Uzbekistan Technological Metals Plant." In particular, it should not create obligations that influence the objective decision-making of the public servant in their official activities.

3.2.3. Perishable and Promotional Items

Perishable goods (e.g., bouquets, sweets) and stationery sets (calendars, booklets, pens, notepads, and notebooks) given to a Company employee are not considered gifts

and do not require formal processing. The employee can dispose of them at their discretion.

3.2.4. Non-compliant Gifts

If a gift received by a Company employee as part of a state delegation or at an official event (including abroad) does not meet at least one of the above requirements, it must be transferred to the Company's ownership in the prescribed manner, regardless of its value.

3.2.5. Personal Gifts

Gifts received by an employee for personal celebrations (e.g., birthday, childbirth, International Women's Day) that are not related to their official duties are considered personal gifts. The only exceptions are gifts received as a result of winning competitions and contests or as awards on the occasion of national holidays, commemorative dates, or other official events.

3.2.5.1. Personal Gifts and Requirements

When giving personal gifts, the following rules must be observed:

Witnesses: The gifts must be presented in the presence of at least three employees from the Company's central office structural divisions.

Clarity: The presentation must include a clear congratulatory speech explaining the reason for the gift.

Total Value Limit: The total value of the gift (including all taxes and fees) must not exceed **4 (four) basic calculated values**.

Individual Contribution Limit: The amount of money spent on the gift by any single employee of the Company's structural division must not exceed **1 (one) basic calculated value** in each specific case.

Prohibited Gifts: To avoid any doubt, employees are forbidden from accepting gifts or other valuables from employees of other state bodies, organizations, partners, contractors, individuals, or legal entities for any holiday (e.g., birthday, childbirth, International Women's Day).

3.2.6. Giving Gifts on Behalf of the Company

The giving of gifts on behalf of the Company at international conferences, symposiums, and other business meetings must be authorized by an order from the Chairman of the Board or one of their deputies.

3.2.7. Seeking Advice

Any employee who has doubts about the legality of receiving a gift must seek a consultation with the Company's Compliance Service.

3.3. Employee Participation in Official Events

3.3.1. Participation in Events by Invitation from International and Other Organizations

Participation in Events by Invitation from International and Other Organizations

Company employees are permitted to participate in official events (exhibitions, seminars, conferences, etc.) by invitation from international and other organizations under the following conditions:

Compliance: The event must comply with the legislation of the Republic of Uzbekistan, the principles and requirements of this Policy, and other internal documents of the Company.

Official Interests: The event must serve the legitimate interests of the Company or the inviting party.

No Influence: The event must not influence any decisions made by the Company's employees and must not be a disguised illegal reward for obtaining any undue advantages.

No Reputational Risks: Information about participation in such an event, if disclosed, must not create reputational risks for the Company, the host, or the inviting party.

Business-Oriented: The event must be in line with generally accepted scientific and business practices and should not be of an entertainment nature.

Justification: The event must be appropriate in its nature and cost, should not be overly luxurious, expensive, or unusual, and should not be held too frequently.

3.3.2. Events Organized by the Company

If the Company itself is the organizer of a business event (seminar, symposium, round table, etc.), then such an event must comply with the requirements set forth in this Policy.

3.4. Regulation of Human Resources Processes (Selection, Promotion, Compensation, and Foreign Property Ownership)

3.4.1. Transparency in HR Processes

The processes for selecting, certifying, and evaluating the performance of Company employees, including compensation, bonuses, and other types of incentives, must be transparent, fair, and objective for all employees. These processes must also comply with the core principles and requirements of this Policy.

3.4.2. Candidate Screening

The process for selecting and appointing job candidates at the Company involves a comprehensive screening. This is done in accordance with the Candidate Screening Instruction and other internal documents of the Company, as well as the conflict of interest management procedure.

3.4.3. Making Personnel Decisions

When making personnel decisions, such as promotions, appointments to positions, inclusion in the talent pool, etc., employees responsible for these decisions are prohibited from granting any unjustified privileges to candidates (employees).

3.4.4. Candidate Selection for Vacant Positions

The selection for vacant positions must be carried out through an open competition or another method that meets the requirements of the position. The primary focus should be on the candidate's qualifications, professional, and academic achievements.

3.4.5. Performance Evaluation and Incentives

The company must develop and implement a system and criteria for evaluating employee performance, which will serve as the basis for incentives. These indicators must be objective, transparent, and accessible for all company employees to review.

3.4.6. Prohibited Activities for Employees

Company employees are prohibited from engaging in entrepreneurial activities or being a founder (participant) of such, obtaining foreign citizenship, opening and holding accounts outside the Republic of Uzbekistan, or owning real estate and other property.

The exceptions are accounts opened for obtaining education, undergoing an internship, or receiving medical services abroad, as well as property acquired and declared before entering public civil service.

3.5. Conducting Internal Audits and Studies of the Company's Structural Divisions

Employees of the Company and its subordinate organizations conducting various internal audits, studies, and monitoring activities (hereinafter referred to as "audited entities") must:

- **Avoid Conflicts of Interest:** Do not allow situations that could lead to a conflict of interest.
- **Work as a Team:** Do not conduct internal audits, analyses, monitoring, or reviews alone.
- **Avoid Private Communication:** When visiting an audited entity in person, do not stay alone with responsible employees of that organization.
- **Comply with the Law:** Do not falsify possible violations or misinterpret the laws of the Republic of Uzbekistan.
- **Refrain from Threats:** Do not intimidate employees of the audited entity with threats of handing over discovered facts to law enforcement or other state bodies.
- **Act Within Authority:** Do not request documents or inquire about matters that are not part of the audit, study, or monitoring.
- **Provide an Objective Assessment:** Ensure a legal and professional assessment of every violation identified during the audit.
- **Document Violations:** If necessary, use video or photo recording to document violations. Enter information about violations into the information systems used by the Company.
- **Be Impartial:** Treat the representatives of the audited entity impartially, in accordance with the principles of conduct for employees of the Company and its subordinate organizations.

3.5.2. Reviewing Objections

A special commission is created to review objections submitted regarding the results of audits, studies, and monitoring activities conducted by the Company.

3.6. Ensuring Transparent and Effective Interaction with Authorized State Bodies, Counterparties, and Third Parties

3.6.1. The Company does not engage suppliers, contractors, or any other third parties to carry out payments or actions that contradict the principles and requirements of this Policy, or the laws of the Republic of Uzbekistan.

3.6.2. Relations with Counterparties

The Company is guided by the principles of legality and transparency in its relations with counterparties.

3.6.3. Supplier Selection Process

The Company has implemented a fair, open, and transparent process for selecting suppliers, contractors, and other counterparties, based on objective criteria. A transparent procedure for determining the cost of goods and services to be procured is also in place. These processes are regulated by the current legislation of the Republic of Uzbekistan and the Company's internal documents.

3.6.4. Interaction with Counterparties

When interacting with counterparties, the Company:

- **Checks Reliability:** Verifies the potential counterparty for reliability, including any past corrupt activities and conflicts of interest with the Company's employees. This check is performed in accordance with the Counterparty Due Diligence Instruction and the requirements of the legislation of the Republic of Uzbekistan.
- **Informs about Policy:** Informs the potential counterparty, including the winner of procurement procedures, about its anti-corruption principles and requirements, including special anti-corruption clauses in the text of the agreement.

3.6.5. Interaction with State Bodies

When interacting with authorized state bodies (e.g., when obtaining licenses, participating in specialized councils, approving various documents and facilities, etc.), the Company ensures transparency and objectivity in the review of documents. When necessary, the Company requests additional information regarding the reasons for negative or other conclusions issued by these state bodies.

3.7. Ensuring a Transparent and Effective Process for Charitable and Sponsorship Activities

3.7.1. Charitable and Sponsorship Activities

The Company may provide and receive charitable and sponsorship assistance in cases established by law. In doing so, all measures must be taken to ensure:

Prevention of Conflict of Interest: Exclude situations where employees' personal interests might influence the process.

Targeted Use of Funds: Ensure the effective and targeted use of funds in accordance with the legislation of the Republic of Uzbekistan or the terms of the agreement.

Public Disclosure of Information: Publish information about charitable and sponsorship activities on the Company's official website.

3.7.2. Prohibition of Hidden Remuneration

Charitable or sponsorship assistance provided or received by the Company must not serve as hidden remuneration. It must not influence the decision-making of individual Company employees in favor of the recipient or donor, their close relatives, related parties, or persons in whom the donor or sponsor has a personal interest.

3.7.3. Requirements for Providing and Receiving Assistance

When providing and receiving charitable or sponsorship assistance, the Company must adhere to the following requirements:

Agreement: An agreement must be concluded with the recipient or donor/sponsor. The agreement must clearly state the goals and forms of the assistance, its monetary

amount, and the method of reporting on the targeted use of funds to the donor or sponsor.

Anti-Corruption Clauses: Anti-corruption clauses must be included in the agreement.

Information Publication: Information about the provided or received charitable or sponsorship assistance must be posted on the Company's official website.

Charitable and sponsorship activities within the Company are regulated by a separate internal regulatory document in this area.

3.8. Anti-Corruption Expertise of Internal Documents

3.8.1. When conducting a legal review of internal documents, the Legal Affairs Department of the Company analyzes them for the presence of corruption-inducing factors that create conditions for corrupt actions. It then takes measures to eliminate these factors from the documents.

3.9. Implementation of New Technologies in the Company's Operations

3.9.1. To minimize corruption risks, Company employees perform their functions and job duties using information technology (where such an option exists).

3.9.2. When conducting tenders for public procurement, Company employees use information technology and interact with tender participants electronically, directly (online), with the possibility of integration with other electronic systems.

3.10. Video Recording and Broadcasting of Company Activities

3.10.1. Audio and Video Surveillance

Audio and video cameras are installed in the Company's buildings to monitor employee activities. The recordings from these cameras are reviewed by designated Company employees.

3.10.2. Online Broadcasting

Online broadcasts of certain high-corruption-risk processes (in particular, employee interviews, testing, and commission meetings, etc.) are posted on the Company's official website.

Chapter 4. Elements of the Anti-Corruption System

4.1. The Presence of Important Internal Anti-Corruption Documents

4.1.1. The anti-corruption system is based on the principles and requirements reflected in the following documents:

Anti-Corruption Policy of the Company;

Code of Ethics of the Company;

Regulation on the Procedure for Conflict of Interest Management.

4.1.2. **Leadership Example** The management of the Company and the heads of its territorial divisions must demonstrate a high level of leadership for their employees.

4.1.3. **Role Models** The Chairman of the Board, their deputies, and the heads of the Company's structural divisions must serve as role models for honest, fair, and independent behavior in their relationships with subordinates, individuals, and legal entities. By doing so, they contribute to the formation of an intolerant attitude towards corrupt actions.

4.1.4. Leadership in Implementation The Chairman of the Board, their deputies, advisors, and the heads of the Company's structural divisions demonstrate leadership in building and implementing an effective anti-corruption system by introducing effective anti-corruption measures and procedures in those areas of the Company's activities where corruption risks exist.

4.2. Identification and Assessment of Corruption Risks

4.2.1. The Company identifies and assesses corruption risks specific to its operations, taking into account both internal and external factors. This assessment is conducted based on the characteristics of the organizational structures' functions, the Company's relationships with other entities, and according to the methodology for assessing corruption risks within the Company.

4.2.2. The corruption risk assessment is performed at least once a year. The results of the assessment are submitted for consideration to the Supervisory Board. Measures and procedures aimed at minimizing the identified risks are outlined in the Anti-Corruption Program or in the Company's roadmaps.

4.3. Responsible for Anti-Corruption

4.3.1. Compliance Service Establishment

The Company has established a separate Compliance Service to create an effective anti-corruption system.

4.3.2. Compliance Service Responsibilities

The Company's Compliance Service operates based on the "Regulation on the Compliance Service" and the resolution dated April 21, 2025, No. PP-147, "On Measures to Ensure the Independence and Enhance the Efficiency of Internal Anti-Corruption Control Units of State Bodies and Organizations." The service reports directly to and is accountable to the Supervisory Board.

Standard Implementation: The service ensures the implementation of and compliance with the requirements of the international standard ISO 37001:2025 "Anti-Bribery Management Systems."

Reporting: The service submits a report on the implementation of the anti-corruption management system to the Supervisory Board and, when necessary, to other authorized state bodies to ensure compliance.

4.3.3. Supervisory Board's Role

The Supervisory Board ensures that the Compliance Service is provided with sufficient independence and the necessary resources to fulfill its anti-corruption duties.

4.3.4. Human Resources Department's Role

The Human Resources (HR) Department is responsible for the systematic and timely collection, analysis, and updating of information about the close relatives and related parties of employees. This is carried out according to the procedures and scope outlined in the "Regulation on Conflict of Interest Management" and the laws of the Republic of Uzbekistan.

4.3.5. Compliance and Ethics Structures

Separate Compliance Service and Ethics Commission structures are in place at all of the Company's systemic enterprises.

4.3.6. Ethics Commission's Role

The Company's Ethics Commission addresses issues of employee compliance with established rules of conduct. It also participates in the process of resolving situations related to conflicts of interest, as defined in the "Regulation on Conflict of Interest Management" within the Company.

4.4. Informing Employees and Third Parties about the Company's Anti-Corruption Policy

4.4.1. Online Information

To reduce corruption risks and raise employee awareness, the Company posts key information about this Policy and the anti-corruption measures being implemented on its official websites.

4.4.2. Employee and Stakeholder Education

The Company makes every effort to inform and explain the rules of the anti-corruption legislation of the Republic of Uzbekistan to its employees and other interested parties. The Company uses the following methods to explain the anti-corruption principles, measures, and requirements that have been implemented:

Continuous Notifications: The Company's management regularly sends messages through the official website and other communication channels about the importance of complying with the anti-corruption rules and requirements accepted by employees.

Training and Testing: Employees receive regular and systematic training and testing on anti-corruption matters at least once a year, in accordance with a set plan.

Onboarding for New Employees: When hired, new employees are required to undergo an anti-corruption briefing. They are familiarized with this Policy and other internal anti-corruption documents of the Company.

Additional Programs: The Company provides additional training programs for high-risk positions. Information on completed courses (training sessions) is stored in the Human Resources (HR) Department.

Information Campaigns: The Company organizes anti-corruption campaigns using thematic audio and video clips and other informational materials aimed at raising awareness among employees and the public about the measures being taken to fight corruption and foster an intolerant attitude towards it.

Consultations: If employees have questions about applying the provisions of this Policy or implementing anti-corruption measures and procedures, the Compliance Service provides them with the necessary consultations.

Active Promotion: Based on the approved training plan, the Compliance Service actively promotes anti-corruption behavior within the Company.

Anti-Corruption Clauses in Employment Agreements: The Company includes anti-corruption clauses in employment agreements concluded with new employees, as well as in existing contracts when their terms are revised.

4.4.3. Anti-Corruption Clauses in Contracts

Anti-corruption clauses are included in all contracts the Company signs with counterparties, partners, charities, and sponsors.

These clauses are part of all Company contracts, with the exception of those resulting from procurement through the electronic store and "E-auction" platforms.

For contracts signed before this Policy was adopted, the anti-corruption clauses will be added when the terms are reviewed or upon the initiative of the parties involved.

4.5. Monitoring, Control, and Reporting

4.5.1. The Compliance Service performs continuous monitoring, control, and evaluation of the effectiveness, sufficiency, and proportionality of the anti-corruption procedures implemented within the Company. Based on the monitoring results, appropriate measures are taken to build an anti-corruption system within the Company.

4.5.2. Monitoring and control are carried out in accordance with the "Methodology for Monitoring and Controlling the Effectiveness of Anti-Corruption Procedures" and other internal Company documents.

4.5.3. Directions of Anti-Corruption System Monitoring

Monitoring of the anti-corruption system should be conducted in the following main directions:

Legislative Compliance: Analysis of the Company's compliance with the legislation of the Republic of Uzbekistan regarding control functions, issuance of permits, and the procurement process.

Legislation Monitoring: Tracking changes in the anti-corruption legislation of the Republic of Uzbekistan and recommendations from state bodies.

International Recommendations: Monitoring recommendations from international and foreign organizations on creating and supporting an effective anti-corruption system.

Media Monitoring: Tracking information in the media about the possible involvement of the Company or its employees, as well as its counterparties or partners, in corrupt activities.

Employee Awareness: Checking the level of awareness of the Company's employees and its subordinate organizations regarding the main anti-corruption principles and requirements.

Internal Process Assessment: Selective monitoring of the Company's internal processes and functions to identify ineffective control mechanisms and procedures and to improve them to ensure the reliability and effectiveness of the anti-corruption system.

Program Execution: Monitoring the completeness and effectiveness of the implementation of the anti-corruption program of the Company and its structural divisions.

Compliance with Requirements: Checking the compliance of the Company's employees and its subordinate organizations with anti-corruption requirements and implemented procedures.

4.5.4. Effectiveness of the Anti-Corruption System

The effectiveness of the Company's anti-corruption system (the absence of corruption risks) is verified by conducting an internal audit of the system. This includes monitoring compliance with established requirements and procedures within the Company and its structural divisions.

4.5.5. Reporting on Monitoring Results

The findings and results of the anti-corruption system's monitoring and control activities are documented in system status reports. The procedure for creating and submitting these reports is outlined in the Company's internal document on the procedure for forming and submitting reports on the state of the anti-corruption system.

4.6. Liability

4.6.1. Employee Liability

Compliance with the Company's anti-corruption requirements and procedures is a duty for every employee as part of their job responsibilities. Employees bear personal liability for violating the requirements and procedures set forth in this Policy and other internal Company documents.

4.6.2. Types of Prohibited Corrupt Actions

Adhering to the principle of zero tolerance for corruption, all employees of the Company are strictly prohibited from participating, either directly or indirectly, personally or through intermediaries, in any corrupt actions, specifically:

Extortion or Receiving an Undue Benefit: It is forbidden to demand, extort, agree to, or receive an undue benefit (property, services, bribes) from anyone using one's official position, or to use that position against the legitimate interests of the Company.

Offering or Giving a Bribe: It is forbidden to offer, promise, authorize, or provide an undue benefit (a bribe) to an official or any other person to influence their actions (or inaction) or to induce them to illegally perform their duties in order to gain advantages for any person.

Mediation: It is forbidden to act as an intermediary in bribery or commercial bribery by transferring an undue benefit or facilitating a deal between the briber and the recipient.

Payments to Simplify Formalities: It is forbidden to demand, receive, or make payments to simplify bureaucratic procedures.

Other Corruption-Related Actions: Any other actions or inactions by employees that show signs of corruption or facilitate its commission are prohibited, including cases where a conflict of interest arises.

4.6.3. Employee Reporting Obligation

Employees are obligated to report to their supervisor and to the Compliance Service any and all cases where they are pressured to commit corrupt acts. They must also report any corrupt actions they are aware of that have been committed by other employees.

4.6.4. Internal Investigations

Adhering to the principle of zero tolerance for corruption, the Company and its structural divisions conduct an internal investigation for every reasonable suspicion of corrupt actions committed by employees. This investigation is carried out in accordance with the regulations and other internal documents, as well as with the requirements of the legislation of the Republic of Uzbekistan.

4.6.5. Accountability

Employees of JSC "Uzbekistan Technological Metals Plant" and its territorial divisions who violate this Anti-Corruption Policy, or the requirements and procedures of

anti-corruption legislation, are held accountable. Liability is incurred regardless of their position, length of service, or other factors, in accordance with the legislation of the Republic of Uzbekistan and the Company's internal documents.

4.6.6. Reporting to the Supervisory Board

Regular information on the results of internal investigations is provided to the Supervisory Board.

4.6.7. Collaboration with Authorities

The Compliance Service cooperates with law enforcement and other state bodies to identify and investigate corruption offenses.

Chapter 5. Reporting Corrupt Actions

5.1. Procedure for Reporting Violations

Procedure for Reporting Violations

If you have doubts about the legality or ethical compliance of an employee's actions, or if you have suspicions or reasonable belief related to corrupt acts or other offenses, you can report them using the following communication channels:

Helpline: A call to this number guarantees confidentiality.

Email: You can send a message to a special address designated for such notifications.

In-person: You can directly contact your supervisor, the Compliance Service, the Chairman of the Board, or the Chairman of the Company's Ethics Commission.

These channels are established so that anyone can safely and confidentially provide information that will help the Company detect and prevent wrongdoing.

Helpline +998 (70) 202-10-10, +998 (93) 123-02-22

Email: anticor@uztmk.uz

Facebook Page: Uzbekistan Technological Metals Plant

Telegram Bot: “O‘zTMK” AJ | Rasmiy kanal

Address: 1 V. Khaydarova Street, Chirchik, Tashkent Region,
111709, Uzbekistan

5.2. Confidentiality and Anonymity

Within its authority and capabilities, the Company ensures the confidentiality of information about the person who provides substantiated information about a legal offense, except in cases provided for by the legislation of the Republic of Uzbekistan.

Anonymous messages sent through the Compliance Service's Telegram channels are also accepted for review.

Please note! However, a whistleblower who wishes to remain anonymous thereby expresses their full and unconditional consent to the following:

The service will not be able to contact the whistleblower to provide a response to the message.

It will not be possible to conduct a full and comprehensive review of the message, as the Service or the relevant executive department (unit, department, sector, service,

division, bureau, office, or other) will not be able to obtain the necessary additional information to consider the appeal.

A Company employee who sends a message will not be contacted for a response in the following cases:

The absence of necessary additional information and evidence to conduct a full and comprehensive internal investigation.

The provision of knowingly false or defamatory information by Company employees or third parties is considered a gross violation of the provisions of this Policy and an example of unethical behavior. Employees or a group of individuals who submit such an appeal may be held liable in accordance with the legislation of the Republic of Uzbekistan, as well as the internal regulatory documents of the Company.

5.3. Protection of Employee Interests

The Company protects the interests of its employees and guarantees that there will be no retaliatory actions, such as dismissal, demotion, discrimination, harassment, or persecution, against employees who have reported in good faith on suspicious behavior by other employees or on a possible violation of the anti-corruption requirements of this Policy.

5.4. Reviewing Reports and Providing Incentives

All reports received through the Company's communication channels are reviewed in a timely and objective manner by the responsible individuals in accordance with the legislation of the Republic of Uzbekistan and the requirements of internal regulatory documents. If the facts stated in the report are confirmed, the person who made the report will be rewarded.

5.5. Liability for False Reporting

The deliberate provision of false information by Company employees is considered a violation of the requirements of this Policy and an example of unethical behavior. The person who reported it, in turn, may be held liable in accordance with the legislation of the Republic of Uzbekistan and the internal documents of the Company.

Chapter 6. Final Provisions

6.1. Policy Review and Adjustment

This Policy may be reviewed and adjusted in the following cases:

- **Changes in Legislation:** When there are changes in the anti-corruption legislation of the Republic of Uzbekistan.
- **Ineffective Measures:** When ineffective anti-corruption control measures and procedures are identified, and when there is a need to improve the set of measures to prevent corruption in the Company's activities.
- **Structural Changes:** When there are changes in the Company's organizational structure or the specifics of its functions.

QUESTIONNAIRE

On the Implementation of the International Standard "ISO 37001:2025 Anti-Bribery Management Systems" at "Uzbekistan Technological Metals Plant"

In Execution of: Law of the Republic of Uzbekistan No. ZRU-419 "On Combating Corruption" of January 3, 2017, Presidential Resolution No. PP-147 "On Measures to Ensure the Independence and Enhance the Efficiency of Internal Anti-Corruption Control Units of State Bodies and Organizations" of April 21, 2025, Presidential Decrees of the Republic of Uzbekistan No. UP-6013 of June 29, 2020, and No. UP-6257 of July 6, 2021

1. Did you personally participate in the adoption of the "Anti-Corruption Policy" dated ____, 2025?

yes ☐

no ☐

2. Do you, as a representative of "UzTMK," fully comply with the requirements of the anti-corruption policy in your work?

yes ☐

no ☐

3. Do you believe there have been instances of corruption offenses by employees of "UzTMK"?

yes ☐

no ☐

4. Are any of your close relatives in management positions at "Uzbekistan Technological Metals Plant (UzTMK)"?

yes ☐

no ☐

5. Have you encountered corruption offenses in your work related to "UzTMK"?

yes ☐

no ☐

6. What are your suggestions for further improving the Anti-Corruption Policy? _____

signature

(Name and Surname)

_____ 2025.