

## UZAVTOSANOAT JSC

### **POLICY ON INCENTIVES FOR EMPLOYEES WHO REPORT CORRUPTION-RELATED OFFENSES OR OTHERWISE CONTRIBUTE TO THE FIGHT AGAINST CORRUPTION**

#### **Chapter 1. General provisions**

1.1. This Policy is developed to ensure the implementation of the Law of the Republic of Uzbekistan "On Combating Corruption" (January 3, 2017), Resolution of the President of the Republic of Uzbekistan No. PQ-81 "On measures to introduce a system for rating the effectiveness of anti-corruption efforts" (January 12, 2022), internal acts of Uzavtosanoat JSC and regulates the procedure for incentivizing employees who report corruption-related offenses or otherwise help fight corruption in Uzavtosanoat JSC (hereinafter referred to as the Company).

1.2. For the purposes of this Policy:

**Corruption** – illegal use by a person of his official or official position in order to obtain tangible or intangible benefits in personal interests or in the interests of other persons, as well as the illegal provision of such benefits;

**Corruption offense** – an act having signs of corruption, for the commission of which the legislation of the Republic of Uzbekistan provides for liability;

**Conflict of interest** – a situation in which the personal interest (direct or indirect) of a justice employee affects or can affect the proper performance of his duties and in which a conflict arises or may arise between the personal interest of employee and the interests of the justice authorities.

**Corruption actions** – direct or indirect, personally or through third parties, receiving, demanding, soliciting, offering, promising and giving a bribe, that is, money, securities, other property, property services, other property rights for an employee's action or inaction in the interests of the bribe giver, mediation in giving and / or receiving a bribe, receiving payments to simplify formalities, illegal use by a person of his official position for the purpose of receiving a bribe and for other illegal purposes.

1.2.1. The following key concepts are used in this Policy:

**employees who report corruption-related offenses or otherwise helped to fight corruption** – employees of the Company;

**active participation in the fight against corruption** – reporting on corruption offenses being prepared, being committed or committed in the Company and its system enterprises;

**otherwise contribute to the fight against corruption** – to inform the law enforcement agencies about the evidence important for the investigation of corruption-related crimes and its disclosure, or to directly assist in the investigation of crimes of this category or in conducting rapid search activities;

**administrative offenses related to corruption** – offenses provided for in Articles 61<sup>1</sup>, 193<sup>1</sup> and 193<sup>2</sup> of the Code of Administrative Responsibility;

**crimes related to corruption** – crimes provided for in the second part of article 167, paragraph "g", the third part of article 168, paragraph "v", articles 192<sup>9</sup> and 192<sup>10</sup>, articles 205, 209 - 214, article 243 of the Criminal Code;

**bodies that carry out operational-search activities and procedural actions related to the detection and exposure of corruption-related crimes (anti-corruption bodies)** – the General Prosecutor's Office of the Republic of Uzbekistan, the State Security Service, the Ministry

of Internal Affairs, the Department for Combating Economic Crimes under the General Prosecutor's Office;

**special commission** – a commission to consider incentives for employees who report corruption-related offenses or otherwise assist in the fight against corruption. By the order of the head of the Company, a permanent special commission consisting of at least 5 people (odd number), i.e. the chairman and members of the commission, is established.

1.3. The following are the main tasks of incentivizing (hereinafter referred to as “incentive”) employees who report corruption-related offenses or otherwise contribute to the fight against corruption:

- forming an uncompromising attitude to all forms of corruption in society and ensuring the effective implementation of policies in this area;
- to ensure the early prevention of corruption-related crimes, timely identification and elimination of the conditions that make it possible;
- to further increase the activity of employees in the fight against corruption and to reward them appropriately for their contribution to this field.

1.4. Incentives is carried out on the basis of the principles of legality, fairness, impartiality, transparency, compliance with the rights, freedoms and legal interests of employees, as well as ensuring their personal safety and taking into account their wishes.

1.5. The requirements of this Policy do not apply to the following employees:

- employees authorized to review reports of corruption-related offenses and conduct official investigations in accordance with the company's internal documents;
- in accordance with legal documents, employees who voluntarily reported corruption-related crimes and directly committed corruption-related offenses.

1.6. The incentive is determined in the form of a one-time monetary award, souvenir or Letter of appreciation.

1.7. Based on reports of corruption violations, the Compliance Department conducts an investigation and, if necessary, conducts a service audit.

## **Chapter 2.**

### **Grounds and types of incentives for employees who report corruption-related offenses or otherwise contribute to the fight against corruption**

2.1. In the event that a corruption-related offense is reported to the company's management or directly to the Compliance Department, and accordingly, a corruption-related offense is exposed, employees who report or otherwise help fight corruption are incentivised with a one-time monetary award, Souvenir or Letter of appreciation.

2.2. Employees who report a corruption-related offense or otherwise contribute to the fight against corruption are incentivized with the following one-time monetary rewards:

a) for a report on an administrative offense related to corruption - in the amount of three times the base calculation amount;

b) for a report on a criminal offense related to corruption:

- for a crime with a low social risk - in the amount of five times the base calculation amount;
- for a less serious crime - in the amount of seven times the base calculation amount;
- for a serious crime - in the amount of ten times the base calculation amount;
- for a very serious crime - in the amount of fifteen times the base calculation amount.

In this,

a one-time monetary reward for reports on the same offense shall be distributed among the reporters (whistleblowers).

2.3. The value of the souvenir can be up to two, five, ten and fifteen times the base calculation amount, depending on the result of the given message (report).

2.4. The employee who reported a corruption-related offense or otherwise assisted in the fight against corruption shall be incentivised as follows:

- four times the amount of the base calculation amount for reporting two or more corruption-related administrative offenses;
- one time incentive, for reporting two or more corruption-related crimes of different classifications, according to the more serious classification of these crimes based on the social danger;
- one time incentive for reporting two or more corruption-related crimes of the same classification.

2.5. Incentives are considered after one of the following decisions is made:

- when the conviction or decision of the court in criminal cases on corruption-related offenses enters into legal force;
- after confirmation of the report (act) of the service inspection conducted on the condition.

2.6. The expenses related to incentives for employees who report corruption-related offenses or otherwise contribute to the fight against corruption is subject to the expense of the Company.

### **Chapter 3.**

#### **Commission for Reviewing Incentives for Employees Who who have for employees who report corruption-related offenses or otherwise contribute to the fight against corruption**

3.1. A permanent special commission consisting of at least 5 people (odd number), i.e. the chairman and members of the commission, will be established by the order of the head of the company to consider the issue of incentives for employees who have for employees who report corruption-related offenses or otherwise contribute to the fight against corruption.

The activity of the commission is also regulated by the relevant Regulation.

3.2. The composition of the special commission is approved by the chairman of the board of the Company.

The head of the Compliance Department must be part of the special commission.

3.3. The secretary of the special commission is appointed without the right to vote, in addition to the composition of the commission specified in paragraph 3.1 of this Policy, from among the employees of the Compliance Department (without breaking away from work) by an order approved by the commission.

3.4. The special commission examines the documents received to incentivise employees who reported wrongdoing or otherwise helped fight corruption.

In accordance with this Policy, the type and amount of incentives will be determined or incentives will be denied, taking into account the importance of whistleblowing and other support for the fight against corruption in achieving result in the detection and/or prevention of corruption-related crimes.

3.5. A meeting of the special commission to consider the incentive will be held within three working days from the date of receipt of the applications (requests).

As a rule, application (request) may be submitted by the Compliance Department (in relation to employees who report violations), by law enforcement agencies (for assistance otherwise provided in the fight against corruption) and in the manner provided for in the Regulation of the company “On the Commission for Incentives for Employees Who Report Corruption Offenses or otherwise contribute to the fight against corruption”.

3.6. The application (request) will be reviewed in accordance with the procedure provided for in Chapter 4 of this Policy.

3.7. The special commission has the right to demand from all branches of the company the documents related to the case for review, and if an expert opinion is necessary to clarify the essence of the case, to involve an expert.

In this, to the specialist involved, information about employees who reported wrongdoing or otherwise helped fight corruption will not be disclosed.

3.8. Application (request) and attached documents received by the special commission, decisions of the commission and other documents are kept in accordance with the laws and internal regulations on the archive.

#### **Chapter 4.**

#### **Procedures for considering and incentivizing employees who report corruption-related offenses or otherwise contribute to the fight against corruption**

4.1. The issue of incentivizing employees who reported a corruption offense or otherwise helped fight corruption will be considered by a special commission established in accordance with the procedure specified in clause 3.1 of the Policy.

4.2. After the adoption of one of the decisions specified in Clause 2.5 of this Policy in connection with the actions taken on the messages received through communication channels to consider the issue of employee incentives, an application (request) is made to the commission in accordance with clause 3.5 of the Policy..

4.3. The following supporting documents are attached to the application (request):

- a copy of the registered application or information confirming the verbal message;
- a copy of a legally binding court decision or conviction;
- copy of identity document;
- bank details of personal accounts of employees who reported a corruption-related offense or otherwise assisted in the fight against corruption.

4.4. The request (application) on the consideration of incentivizing and supporting documents attached to it shall be submitted to the special commission within three working days, from the date of emergence of the justification for incentive.

4.5. Within three working days from the date of receipt of documents related to incentives by the special commission, the secretary reviews the completeness, validity and compliance of the documents submitted with the requirements of this Policy.

If it is determined that the received request and attached documents are incomplete and that the requirements of this Policy have not been complied with during their formalization, the secretary notifies the chairman of the special commission and returns the documents to the executor within two working days.

Documents may be resubmitted in accordance with the requirements of this Policy if the grounds for return are eliminated.

When the initial study is completed successfully, a message is sent to the members of the special commission with the signature of the chairman of the commission indicating the meeting place, time and other necessary information.

4.6. Decisions issued by the special commission on incentives are formalized in the form of a report with the signature of "XDFU" (confidential). The content of the received message, the identified circumstances, the achieved result, and the type and amount of incentives are clearly indicated in the report.

4.7. Based on the relevant decision of the special commission, the executive secretary of the commission prepares a draft of the order of the head of the Company on awarding a one-time monetary award, souvenir or Letter of appreciation (with the signature "XDFU" within one working day).

The order does not include the reason for the incentive and the statement of the special commission, but reference is made to the relevant protocol.

4.8. After the order is confirmed, execution is provided in accordance with the procedure for working with documents for use within the service.

A one-time cash prize will be paid by the accounting service within ten working days, and a souvenir, in accordance with legal documents, the souvenir item will be handed over by a special commission within five working days after purchase.

4.9. Cash prizes and souvenirs given to encourage employees who report corruption-related offenses or otherwise help fight corruption are subject to taxation in accordance with the Tax Code of the Republic of Uzbekistan.

#### **Chapter 5.**

#### **Guarantees of non-retaliation and confidentiality of employees who report corruption-related offenses or otherwise contribute to the fight against corruption**

5.1. In order to ensure the safety of employees, their family members and close relatives, information about them is kept confidential based on the requirements established by legislation.

5.2. In order to ensure the safety of employees, their family members and close relatives, information about them may be disclosed based on the requirements established by legislation.

5.3. Protection of employees, their family members and close relatives is carried out in accordance with legal documents.

#### **Chapter 6.**

#### **Procedure for compiling statistical data**

6.1. An account of employees who are incentivized and their incentive activities is maintained by the Compliance Department.

6.2. Statistical information about employees can be provided to the Anti-Corruption Agency of the Republic of Uzbekistan and other authorized state bodies.

#### **Chapter 7.**

#### **Notification method and procedure**

7.1. If employees need advice on this Policy, as well as believe that this Policy has been violated by someone, they should call the Compliance Department on the hotline +998-78-140-76-70 or send an e-mail to [compliance@uzavtosanoat.uz](mailto:compliance@uzavtosanoat.uz).

7.2. In the Company, retaliation and/or taking any measures against individuals who report potential violations in good faith is prohibited (except for cases in which the reported is involved in the violation). The Company will ensure that their personal information remains confidential.

#### **Chapter 8.**

#### **Final provisions**

8.1. Disputes related to incentives for employees who reported corruption offenses or otherwise helped fight corruption are resolved in accordance with the procedure established by legislation.

8.2. Employees who are guilty of violating the requirements of this Policy will be held accountable in accordance with the procedure established by law.