

“APPROVED”
Annex No. 9
to the Minutes of the Meeting
of the Supervisory Board
of the Joint Stock Company
“Entrepreneurship Development
Company”
dated April 29, 2024
No. 6/24

POLICY
of the Joint Stock Company “Entrepreneurship Development Company”
on Informing about Violations

“SUBMITTED”
by executive body
of the Joint Stock Company
“Entrepreneurship Development
Company”

Tashkent – 2024

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Note:

This document is an unofficial translation of the original document in the Uzbek language and is provided for reference purposes only. In the event of any discrepancies, the original version of the document in the Uzbek language shall prevail.

I. General Provisions

1. The Joint Stock Company “Entrepreneurship Development Company” (hereinafter - the Company) regulates the procedure for informing about violations, designates the authorized body to which such reports shall be submitted, and establishes measures to ensure the protection of informants through this Policy on Informing about Violations (hereinafter – the “Policy”).

II. Purpose and Scope of the Policy

2. The purpose of this Policy is to provide the Company’s employees with the opportunity to report unlawful actions.

3. The Company undertakes to protect employees who perform their duties in good faith from retaliation. This Policy also explains to employees what constitutes protected activity, which channels shall be used for reporting information, and in which exceptional cases an employee may disclose the relevant information

4. This Policy applies to all employees of the Company, including members of the Executive Body.

III. Key Definitions and Rules

5. Conduct contrary to established norms means non-compliance by an employee of the Company with the requirements of legislation and the Company’s internal rules.

6. **Protected activity** includes submitting reports through the channels specified in this Policy containing information about potential violations of regulatory requirements. Protected activity also includes assisting employees of the Compliance Department and/or Internal Audit in the course of their lawful duties.

7. **Retaliation** within the scope of protected activity means any direct or indirect harm, damage, or malicious actions against the reporter that were recommended, threatened, or carried out. Retaliation may include, among other things, discriminatory treatment, changes in salary, demotion, transfer to another position or location, or dismissal.

8. **A reporter** is an employee of the Company engaged in activities that fall under the category of protected activity.

9. Employees of the Company are required to report suspected cases of actual or potential violations of established norms, as well as any actions that harm or may harm the Company’s business reputation.

10. To receive protection under this Policy, a reporter must have reasonable grounds to believe that the information provided is truthful. Employees who

intentionally report false or misleading information are not considered reporters and, accordingly, are not entitled to the protection provided by this Policy. In the event that it is confirmed that knowingly false information has been submitted, disciplinary measures may be applied to such employees.

11. The Company encourages its employees to report their suspicions or concerns, knowing that they will be protected from retaliation. Disclosure of the identity of the employee who reported the violation may help the Company verify the credibility of the complaint. At the same time, under certain circumstances, the reporter has the right to request anonymity or non-disclosure of their identity.

12. No employee shall use their official position to obstruct other employees from exercising their rights or performing their job duties.

IV. Implementation of the Policy

13. The reporter must report violations to the Compliance Department or to a superior manager, who, in turn, are obliged to accept such reports, provide relevant information if necessary, offer assistance, and ensure that appropriate measures are taken following receipt of the report.

14. The Compliance Department is responsible for ensuring an appropriate level of awareness regarding the reporting procedures, receiving all reports, ensuring their review by the relevant officials, as well as maintaining communication with the reporting person and informing them of updates in the process.

15. A reporter may submit a report by one of the following methods:

by email;

by postal mail;

through a hotline;

through direct contact with the authorized person

16. For proper verification and assessment of submitted reports, the following information should be included in the report whenever possible:

a detailed description of the occurred or potential incident;

the location, time, and date of the incident, or the estimated place and time of its possible occurrence;

the name and position of the person(s) involved in the incident, or other identifying information;

the name and position of the person submitting the report, if the report is not submitted anonymously;

the reasons that prompted the submission of the report or complaint;

references to existing documents that confirm the accuracy reported facts.

17. If the reporter does not wish to report to the Compliance Department using

one of the above methods, they may inform the Head of Human Resources or the Company Director. Upon receiving the report, the relevant official must immediately forward it to the Compliance Department. Any reports submitted to another Company manager must also be promptly forwarded to the Compliance Department or one of the above-mentioned structural units of the Company.

18. The identity of the reporting person shall be treated with the highest possible level of confidentiality, except in cases where the reporting person has consented to the disclosure of their identity or where otherwise required by legislation. In such cases, the Company shall be obliged to notify the reporting person in advance of the disclosure of their identity.

19. In certain cases, the Company allows the possibility of external reporting, whereby reporting persons notify about alleged violations concerning the Company by external parties. For such external reporting to fall under the protection provided by this Policy, the report must be necessary to prevent one of the following:

- the occurrence of a serious threat to public safety or health;
- serious damage to the Company's activities or a violation of national or international law.

20. A person who decides to report external information, if doing so non-anonymously, must strictly comply with the above conditions in order to receive protection under this Policy.

21. The Company prohibits retaliation against reporters engaged in protected activities. In cases where retaliation by employees is identified, such actions will be considered misconduct and may result in disciplinary measures.

22. Any reporter who believes they have been subjected to retaliation must provide the Compliance Department with all available information and documents supporting their claims of retaliation, using one of the reporting methods described above.

V. Rights of Involved Employees

23. Employees who are the subject of a report or may become such must be promptly informed of the allegations made against them, provided that such notification does not impede the investigation of the circumstances.

24. Since the reporting of violations and subsequent procedures involve the processing of personal data, such data shall be handled in accordance with the provisions of applicable regulatory acts and the Company's internal documents on personal data protection.

25. The Compliance Department is the responsible unit for the implementation of this Policy. The Compliance Department is accountable for updating the Policy

and implementing best practices. The authorized officer is responsible for ensuring the effective application of this Policy.

26. Every employee of the Company is obliged to comply with this Policy.

VI. Monitoring compliance with the Policy

27. The Compliance Department reviews this Policy at least once every two years or, if necessary, from time to time, to identify required changes and additions in accordance with the objectives of the Policy, as well as to ensure compliance with applicable laws, internal policies, and procedures of the Company.

28. Any amendments to this Policy shall be approved by the Supervisory Board based on the recommendation of the Anti-Corruption and Ethics Committee under the Supervisory Board.