

“APPROVED”
by Supervisory board
JSCMB “Ipoteka-bank”
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ANTI-CORRUPTION POLICY

JSCMB “IPOTEKA-BANK”

Tashkent - 2022


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DOCUMENT REVISION CHRONOLOGY

Name of document:		Anti-corruption Policy of Joint-stock commercial mortgage bank “Ipoteka-bank”	
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Approved by:	Supervisory board of JSCMB “Ipoteka-bank”		April 29, 2022
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Developed by:		Date:	Signature:
Compliance control department		April 2022	
Agreed with:			
Legal department		April 2022	
#	Release date	Effective date	Brief description of the changes
1.0	Feb 28, 2021	Mar 27, 2021	This Policy was developed in accordance with the Law of the Republic of Uzbekistan "On banks and banking activity”
2.0	Dec 21, 2021	Dec 21, 2021	In accordance with the Decree of the President of the Republic of Uzbekistan #PP-5177 dated July 6, 2021 "On additional measures for the effective organization of anti-corruption activities", the recruitment of employees on the basis of open competition, monitoring of testing activities in the tender process via the Internet in real time, conducting a survey to determine the propensity of candidates to engage in corruption, ensuring transparency in the tender commission to ensure transparency and comprehensive convenience of procurement, requirements to mandatory public announcement of the results of the tender were included into this Policy
2.1	Apr 29, 2022	May 01, 2022	Policy was revised and form of the Policy was updated

DOCUMENT ACCESS CONTROL


Control and storage of the document is carried out according to the list indicated in the table below:

#	Holder of the document holder (position)	Format of the document
1	Corporate consultant service	Original in PDF Copy in Word
2	Compliance control department	Copy in PDF Original in Word
3	Electronic library of internal regulatory documents of the Bank	Copy in PDF


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1. Abbreviations and definitions

#	Abbreviation	Definition
1	Bank	Joint-stock commercial mortgage bank “Ipoteka-bank”
2	bribe	a type of corrupt act, bribing a public official in the form of money, securities, other property, property profits and/or services, value of property or services
3	bribery	bribe taking, bribe giving or mediation in such an offence
4	bribe giving	presentation of tangible or intangible assets to a official of the Bank personally or through an intermediary in the interests of the bribe-giver
5	CCD	Compliance control department of JSCMB “Ipoteka-bank”
6	official	officials of the Bank are members of Supervisory board, Management board of the Bank, as well as employees whose job duties enable them to make decisions related to the activities of the Bank and/or have a significant influence on the activities of Bank
7	interested persons	for the purposes of this Policy, interested persons of the Bank include customers, counterparties, business partners of the Bank, state authorities of RU and other third parties entering into or being in any relationship with the Bank
8	counterparty	a legal entity, individual entrepreneur, natural person wishing to establish or having established a relationship with the Bank on the basis of a mutual agreement
9	conflict of interest	this is a conflict between groups of shareholders, between shareholders and officials of the Bank, between shareholders and SB, between shareholders and the work team, in relation to property, financial flows and business in general, between the management bodies of the Bank and the wort team, between structural units, between lending units and customers, between the Head Bank and branches
10	corruption offence	an act bearing the hallmarks of corruption, for the commission of which the legislation of RU provides for liability
11	corruption	unlawful use by the Bank’s official of his/her job or official position for the purpose of obtaining material or non-material benefits for his/her own benefit or for the benefit of other persons, as well as unlawful provision of such benefits
12	SB	Supervisory board of JSCMB “Ipoteka-bank”
13	Management bodies of the Bank	General shareholders meeting, Supervisory board and Management board
14	Policy	Anti-corruption Policy of JSCMB “Ipoteka-bank”

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#	Abbreviation	Definition
15	bribe taking	acceptance by an official of the Bank personally or through an intermediary in the interests of the bribe-giver of tangible or intangible valuables
16	employees of the Bank	any individual having concluded an employment agreement with the bank
17	RU	Republic of Uzbekistan
18	CBU	Central bank of the Republic of Uzbekistan

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1. General provisions


- 1.1. Anti-corruption Policy of JSCMB "Ipoteka-bank" establishes goals and objectives for combating corruption, corruption risk management system, at the same time defines types of corrupt practices, basic principles in determining and applying measures to combat corruption, corruption risk management bodies.
- 1.2. This Policy is intended to ensure that the Bank's employees are aware of and comply with anti-corruption laws.
- 1.3. The Policy applies to all management bodies of the Bank and its employees.

2. Main regulatory documents

- 2.1. Law of the Republic of Uzbekistan "On banks and banking activity";
- 2.2. Law of the Republic of Uzbekistan "On combating corruption";
- 2.3. Criminal Code of the Republic of Uzbekistan;
- 2.4. Labor Code of the Republic of Uzbekistan;
- 2.5. Decree of the President of the Republic of Uzbekistan "On additional measures for effective organization of activities on counteraction of corruption" #PP-5177 dated July 6, 2021;
- 2.6. Order of the President of the Republic of Uzbekistan "On measures to further improve the system on counteraction of corruption in the Republic of Uzbekistan" #UP-5729 dated May 27, 2019;
- 2.7. Law of the Republic of Uzbekistan "On appeals of physical and legal persons";
- 2.8. Standards of the Association of Banks of Uzbekistan.

3. Goals and objectives of Anti-corruption Policy

- 3.1. The main goals of the Policy:
 - 3.1.1. forming in the Bank a lack of tolerance to all manifestations of corruption both within the Bank and in relations of the Bank with customers, business partners, counterparties and state and supervisory authorities of RU;
 - 3.1.2. development and implementation of a systematic approach to prevent cases of corruption, minimize the risk of involvement of the Bank and/or its employees in corrupt activities;
 - 3.1.3. creating a system of corruption risk management, including timely detection, suppression, eradication of causes and conditions of occurrence of corruption.
- 3.2. The main objectives of the Policy:
 - 3.2.1. timely detection, prevention and suppression of corruption offences, elimination of their consequences, causes and conditions contributing to them, ensuring the principle of inevitability of responsibility for corruption offences;
 - 3.2.2. informing the Bank's employees about regulatory and legal support for corruption prevention and liability for corruption offences;
 - 3.2.3. determination of the basic principles of corruption prevention in the Bank;
 - 3.2.4. identification of the officials and structural units of the Bank responsible for the implementation of the Policy.

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4. Corruptive actions

4.1. Corruptive actions mean:

- 4.1.1. bribe-giving or intermediation in bribe-giving;
- 4.1.2. taking a bribe or mediation in taking a bribe;
- 4.1.3. abuse of one's official position and/or authority contrary to the Bank's legitimate interests in order to obtain a benefit in the form of money, valuables, other property or property services, other property rights for oneself or for third parties or illegal provision of such a benefit to the said person by other individuals.

4.2. Corruptive actions may be committed both by the Bank's employees in relation to customers, counterparties, business partners, state and political persons, and by customers, counterparties, business partners, state and political persons in relation to the Bank directly or indirectly, personally or through third parties.

5. The Bank's basic principles in definition and implementation of measures of the Bank on counteraction of corruption

5.1. Counteraction of corruption is based on the following basic principles:

5.1.1. The principle of legality.

The Bank carries out its activities and apply anti-corruption measures in accordance with the requirements of applicable laws and regulations of the Republic of Uzbekistan, generally accepted market norms and IRD of the Bank.

5.1.2. The principle of priority of the rights, freedoms and legitimate interests of citizens.

The Bank's employees observe the rights, freedoms and legitimate interests of citizens in their interaction within the Bank and/or with third parties.

5.1.3. The principle of openness and transparency.

The Bank discloses information about the Bank and its management in strict compliance with Regulation on Information Policy of the Bank and other IRD. At the same time, the Bank informs all interested parties about the anti-corruption business standards adopted by the Bank by posting this Policy on the Bank's website.

5.1.4. The principle of personal example of the Bank's management bodies.

The Bank's management bodies pursue the Policy by not accepting any type of corruption in their decision-making and by their personal example, contribute to strengthening the anti-corruption culture and standards of conduct in the Bank.


5.1.5. The principle of involvement of the Bank's employees.

The Bank's employees must be aware of the provisions of the anti-corruption legislation of RU and actively participate in the formation and implementation of anti-corruption standards and procedures in the Bank.

5.1.6. The principle of proportionality of anti-corruption measures to the risk of corruption.

Development and implementation of a set of measures that can reduce the possibility of involvement of the Bank, its management and employees in corruption activities, is carried out taking into account the existing corruption risks in the activities of the Bank.

5.1.7. The principle of efficiency of anti-corruption procedures.

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When developing and implementing anti-corruption measures, the Bank is guided by the principle of efficiency, namely, the possibility of obtaining a meaningful result at the lowest cost and simplicity of measures.

5.1.8. The principle of continuous control and regular monitoring of the implemented standards and procedures under the provisions of this Policy and other IRD of the Bank. CCD conducts control and monitor the provisions of this Policy and other Bank's IRD regulating anti-corruption issues.

5.1.9. The principle of interaction with the state and civil society.

The Bank closely cooperates with state authorities engaged in anti-corruption activities, as well as control over compliance with the anti-corruption legislation of RU. The Bank developed and implemented Whistleblowing Policy at JSCMB "Ipoteka-bank" and to ensure that any person, including a Bank employee, can freely report corruption, a special email whistleblowing@ipotekabank.uz was created to which only Director of CCD, Deputy Director of CCD and Head of Anti-bribery and corruption Unit have access.

5.1.10. Principle of unavoidability of responsibility. Принцип неотвратимости ответственности.

The Management board of the Bank is responsible for implementation and compliance with this Anti-corruption Policy in the Bank. The Bank's employees, regardless of their position and period of experience, in case of committing corruption offenses by them in connection with the performance of job responsibilities duties, are liable on the basis of the current legislation of the Republic of Uzbekistan.

6. Assessment of corruption

6.1. The purpose of corruption risk assessment is to identify specific processes and business operations in the Bank's activities in implementation of which that are most likely to involve corruption offenses by Bank employees, both for personal benefit and for the benefit of the Bank.

6.2. Corruption risks are assessed by CCD through:


6.2.1. analyzing business processes and sub-processes, identifying "critical actions" in these business processes and sub-processes, the implementation of which may lead to corruption risks;

6.2.2. identifying possible corrupt practices in the implementation of a business process or sub-process;

6.2.3. identification of officials whose participation is necessary to commit corrupt acts;


6.2.4. determining the possible forms of corruption payments.

6.3. As a result of corruption risk assessment, CCD draws up a Map of corruption risks of the Bank and a list of positions with a high corruption risk, which shall be approved by SB. These documents are reviewed annually by CCD and approved by SB.


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7. Corruption risk management and anti-corruption measures


- 7.1. Effective management of the activities of the Bank on counteraction of corruption is ensured through effective and efficient cooperation between the management bodies, officials, employees of the Bank, customers, counterparties, and business partners of the Bank.
- 7.2. The functional roles within the Bank's anti-corruption activities are allocated as follows:
- 7.3. Members of Supervisory board of the Bank within the scope of their authorities:
 - 7.3.1. approve this Anti-corruption Policy;
 - 7.3.2. monitor observance of this Policy.
- 7.4. The Bank's Management Board within the scope of its authorities:
 - 7.4.1. ensures compliance of the Bank's activities with the requirements of legislation of RU, as well as compliance with legislation of RU and IRD of the Bank in the sphere of anti-corruption;
 - 7.4.2. builds a culture of rejection of corruption in any form or manifestation among the Bank's employees;
 - 7.4.3. ensure that the Bank's employees are aware of possible corruption risks and ways to prevent them;
 - 7.4.4. takes all necessary measures to prevent corruption in the Bank, as well as in interaction of the Bank with customers, counterparties and business partners;
 - 7.4.5. is responsible for transparency of all business processes and decision-making mechanisms in the Bank, awareness of employees about possible corruptive actions and measures to prevent and combat corruption;
 - 7.4.6. ensures anonymity and effective protection, as well as encouragement of employees who have reported suspicions or facts of corruptive actions within the Bank.
- 7.5. Compliance control department of the Bank:
 - 7.5.1. develops the Policy, as well as other IRD in the field of combating corruption in the Bank;
 - 7.5.2. makes recommendations on improving the Bank's policies and procedures to combat corruption;
 - 7.5.3. develops a set of measures to eliminate or minimize corruption risks, as well as recommendations and measures to counteract corruption in the Bank;
 - 7.5.4. advises the Bank's employees regarding the correct implementation of and compliance with legislation of RU and IRD of the Bank on combating corruption;
 - 7.5.5. in accordance with the international anti-corruption standard ISO 37001, together with HR department, takes measures to train and certify employees in order to raise awareness of the Bank's employees in the sphere of combating corruption;
 - 7.5.6. considers reports, complaints about possible corruptive actions of the Bank's employees in servicing customers, interaction with counterparties and business partners of the Bank, conducts checking such reports and complaints, timely informs SB and Audit Committee as well as Management board to take necessary measures to eliminate and impose punishment on the Bank's employees who became parties to corruptive actions and/or with whose connivance became and/or possible corruptive actions in the Bank and/or the Bank was involved in corruptive actions;

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- 7.5.7. places visual information materials (stands, photos, booklets, etc.) about the Bank's Policy, anti-corruption measures and communication channels for customers, counterparties and business partners of the Bank to report corruption actions of the Bank's employees, possible measures to eliminate corruption offences in places convenient for review by customers, counterparties and business partners of the Bank, in the buildings of the Head Office, branches, banking service centers, mini-banks, universal cash desks and 24/7 places;
- 7.5.8. conducts identification and assessment of potential corruption risks, analyses the Bank's business processes, decision-making procedures in the Bank, job responsibilities of the Bank's employees for possible cases of corruption in the Bank, identifies the Bank's officials, whose involvement in corruption actions is highly possible, develops special anticorruption procedures and requirements for such officials, for example, regular completion of the declaration on conflict of interest, informs SB, Audit Committee and Management board about the results;
- 7.5.9. controls timely implementation by all structural units of the Bank of the measures specified in the Bank's Road Map for combating corruption and preventing shadow economy;
- 7.5.10. conducts checking counterparties and business partners of the Bank in procurement activities and when the Bank provides charitable and sponsor assistance for possible corruptive actions and/or possible involvement of the Bank in corruptive actions;
- 7.5.11. conducts official investigations with the participation of specialists of the relevant structural units of the Bank, involving the person who reported the facts of corruption or possible corruptive actions;
- 7.5.12. performs analysis of possible conflicts of interests in the Bank for possible corruption offences and informs SB, Audit Committee and Management board about the results;
- 7.5.13. conducts assessment Code of business conduct and corporate ethics for reflection of anti-corruption provisions adopted by the Bank;
- 7.5.14. interacts with the authorized state bodies on combating corruption, as well as provides timely regulatory reporting to these bodies and to the Central Bank on measures to combat corruption in the Bank, the facts of corruption, as well as the implementation of measures identified in the Roadmap of the Bank to combat corruption and prevent the shadow economy.
- 7.6. Legal department:
- 7.6.1. conducts a legal review of IRD of the Bank to ensure their compliance with legislation of RU and regulations of CBU;
- 7.6.2. on a monthly basis, inform CCD and the relevant units of the Bank of any changes in legislation of RU in the area of combating and preventing corruption and/or affecting the Bank's activities and/or its interaction with customers, counterparties, business partners.
- 7.7. HR department:
- 7.7.1. informs all employees of the Bank with the Bank's internal labor regulations, corporate standards of the Bank, and the ethics rules of Bank employees, and organize their training to ensure proper performance of job responsibilities by the Bank's employees;

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- 7.7.2.in accordance with the Bank's Roadmap for combating corruption and preventing shadow economy in order to form intolerant attitude towards corruption, conducts seminars, meetings and round tables on anti-corruption topics for the Bank's employees;
- 7.7.3.takes measures to ensure an uncompromising attitude of the Bank's employees towards receipt of any "gifts or other benefits" of material value in the performance of their job responsibilities;
- 7.7.4.in order to further develop the anti-corruption system, trains employees and organizes certification seminars in accordance with the international standard ISO 37001;
- 7.7.5.ensure unconditional compliance with the Bank's internal labor regulations, performance discipline, corporate standards of the Bank and the ethics rules professional ethics by the Bank's employees;
- 7.7.6.ensure that the Bank's employees are aware of their anti-corruption obligations, not to abuse their official obligations in their personal interests, not to allow embezzlement, corruption, extortion and other offences, and informs CCD of such violations or the possibility of their occurrence in a timely manner;
- 7.7.7.in accordance with the Bank's Roadmap for combating corruption and preventing shadow economy, conducts annual testing and assessment of the knowledge of the Bank's employees of IRD of the Bank on combating corruption;
- 7.7.8.ensure the selection of employees on the basis of transparently organized and conducted personnel selection contests, conducts a survey (psychological test questions) to determine the predisposition of candidates to corruption.
- 7.8. General affairs division:
- 7.8.1.in accordance with the Bank's Roadmap for combating corruption and preventing shadow economy, implements measures to reduce corruption in product procurement, including ensures transparency of the tender commission to ensure openness and all-round convenience of conducted procurement, and in a mandatory manner openly announces the tender results.
- 7.9. Information and brand management Service of the Bank:
- 7.9.1.is responsible for the completeness and relevance of anti-corruption information on the Bank's official website, including but not limited to:
- regulatory legal acts of RU and IRD of the Bank in the field of anti-corruption;
 - Code of business conduct and ethics rules of the employees of the Bank;
 - reports and information on anti-corruption measures.
- 7.9.2.monitors the information placed in mass media about corrupt practices of the employees of the Bank;
- 7.9.3.ensure cooperation between the Bank and mass media in combating corruption, including broadcasting measures on anti-corruption.
- 7.10. All employees of the Bank:
- 7.10.1. must familiarize themselves with the legislation of RU in the sphere of counteraction of corruption, as well as the requirements of this Policy, and signs obligation on complying with these requirements in accordance with Attachment #1 to this Policy;
- 7.10.2. must carry out their activities in strict compliance with their job descriptions and the Bank's IRD on combating corruption, not abuse or exploit their official position for


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personal gain, not allow cases of corruption, bribery, extortion and other negative circumstances, and inform CCD of any facts of such offences or the possibility of such offences occurring at the Bank;


- 7.10.3. must immediately report to CCD if an employee has any suspicion or information about a possible corruptive action or corruptive inaction of other employees, counterparties, business partners, customers or other persons entering into relations with the Bank.
- 7.11. Bank employees are prohibited from performing any of the activities specified in article #4 of this Policy. It is also strictly prohibited to give or take, directly or indirectly or through third parties, various types of bribes to facilitate their bureaucratic and other formalities, personally or through intermediaries to promise, offer or present any illegal advantage to an official or a natural or legal person to perform any act or inactivity in the performance of their official duties.

8. Consideration of information on the facts of corruption and response measures

- 8.1. Information on corruption may be received by CCD:
- 8.1.1. through the hotline of the Bank;
 - 8.1.2. from the Government of RU on the basis of the appeals made to the virtual reception of the Government;
 - 8.1.3. from the Apparatus of the Bank on the basis of the appeals made to the virtual reception of the Management board of the Bank;
 - 8.1.4. direct application sent to CCD in the form and manner prescribed by the legislation of RU;
 - 8.1.5. as a result of inspections conducted by employees of CCD;
 - 8.1.6. as a result of inspections conducted by employees of Internal audit department;
 - 8.1.7. as a result of inspections conducted by the employees of the authorized state bodies of RU;
 - 8.1.8. messages received by telephone or e-mail specified on the Bank's website.
- 8.2. The following appeals are not considered:
- 8.2.1. anonymous appeals;
 - 8.2.2. appeals submitted through representatives of individuals and legal entities, in the absence of documents confirming their authority;
 - 8.2.3. appeals that do not meet other requirements established by the Law on Appeals of physical and legal persons of RU.
- 8.3. Director of CCD assesses the appeal for the recognition of its anonymity and compliance with the requirements to the message formatting as specified in articles #8.6-8.7 of this Policy. In this case, the appeal is recognized as anonymous, if the name, surname (name of the organization) and address or telephone number for feedback are missing in the appeal.
- 8.4. If an appeal is recognized as anonymous, an employee of CCD draws up a conclusion indicating the grounds for the recognition of an appeal as anonymous and approved by Director of CCD.
- 8.5. References recognized as anonymous from the date of approval of the conclusion are removed from the control or execution and are not considered.

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- 8.6. An appeal of an employee of the Bank should contain the following information:
- surname, given name and father's name of the employee;
 - position being held;
 - subdivision (structural unit);
 - information about an appeal made in order to induce the employee to commit a corruption offence;
 - information about the person (persons) coercing or inducing the employee to commit a corruption offence;
 - information on the place, time and other circumstances of inducing or coercing the employee to commit a corruption offence;
 - essence of the corruption offence or information on the essence of the possible offence to which the employee is coerced or induced;
 - attachment of all available materials evidencing the circumstances of the appeal of any person in order to induce the employee to commit a corruption offence (desirable, but not compulsory).
- 8.7. An appeal from a customer, counterparty, business partner of the Bank should contain the following information:
- surname, given name and father's name of the applicant;
 - information about a planned or completed corruptive action, specifying the employee of the Bank involved in the corruptive action, information about the place, time and other circumstances;
 - attachment of all available materials confirming the facts of a planned or already committed corruptive action (desirable, but not mandatory).
- 8.8. All appeals filed in accordance with the requirements of articles #8.6 and 8.7 of this Policy should be reviewed and examined by CCD. In case of revealing signs of violations or offence based on the results of the examination of an appeal, CCD shall send information about such an appeal to the Ministry of Internal Affairs and the Prosecutor General's Office for taking lawful measures
- 8.9. Information about a person who has reported suspicious activity, corruption offenses or abuses related to the Bank, its employee or a legal entity controlled by the Bank is considered confidential and is not subject to be disclosed to the guilty parties, at least until the end of the inspection and/or the moment of bringing the guilty parties to responsibility, in case the fact of corruption offenses is confirmed.
- 8.10. CCD should check the information specified in the appeal and, if necessary, may involve either the employees of Internal audit department (as agreed with Director of Internal audit department) or employees of another structural unit of the Bank (as agreed with the Chairman of Management board) and present the results as specified in article #8.11 of this Policy.
- 8.11. Director of CCD should:
- 8.11.1. immediately inform the Chairman of Management board of the Bank about the facts of the confirmed offense for the latter to take necessary measures, including bringing to responsibility and punishment of the guilty employees of the Bank;

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- 8.11.2. immediately inform the Chairman of the Audit Committee, if an official of the Bank is a party to the offense;
- 8.11.3. inform SB and Audit Committee as part of the submission of the quarterly compliance report.
- 8.12. Appeals and materials on conducted inspections are stored in CCD of the Bank.

9. Interaction with customers, counterparties, business partners of the Bank, state bodies


- 9.1. When interacting with customers, counterparties, business partners of the Bank, state agencies, the Bank is guided by the principles of mutual benefit, honesty, transparency, openness and observance of the rights and interests of both parties.
- 9.2. The Bank's employees should be careful in selecting counterparties and business partners, conducts analysis of a counterparty, business partner for corruption risks, conflict of interests before the beginning of interaction with such counterparty, business partner.
- 9.3. When providing services to customer, each employee of the Bank is obliged to precisely and completely perform the contractual obligations of the Bank, the legal orders of the customer and to provide customers with complete, verified information or consultation regarding the services of the Bank and its tariffs for banking services.
- 9.4. The Bank and its employees are prohibited from interacting with customers, counterparties, business partners if such interaction creates conditions for corruptive actions, contrary to the requirements of anti-corruption legislation of RU and this Policy.
- 9.5. Concealment and/or not providing and/or not timely providing information about the facts of corruption, including bribery, is the basis for bringing an employee of the Bank to responsibility in accordance with the legislation of RU.

10. Cooperation in the sphere of counteraction of corruption

- 10.1. The Bank and its employees, as active participants of civil society, should closely cooperate and interact with state authorities, counterparties, business partners and customers of the Bank in the sphere of counteraction of corruption for the following purposes:
 - 10.1.1. Establishing a corruption offence and persons suspected (accused) in that crime, their location, as well as the location of other persons who committed the corruption offence;
 - 10.1.2. Establishing property obtained as a result of a corruption offense or became a means of committing a corruptive action;
 - 10.1.3. Exchange of information on counteraction of corruption.
- 10.2. Cooperation and interaction with state authorities is carried out by CCD.

11. Responsibility for violation of this Policy and legislation of RU on counteraction of corruption


- 11.1. In case of committing a corruption offense, employees of the Bank are brought to criminal, civil and disciplinary responsibility in accordance with the legislation of RU.

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- 11.2. If on behalf of the Bank or pursuing interests of the Bank a corruption offense has been committed or conditions for organization, preparation and committing a corruption offense have been created, the Bank officials may be subject to liability measures in accordance with the legislation of RU and IRD of the Bank.
- 11.3. Implementation of disciplinary punishment of responsibility for a corruption offence in the Bank is not exempt the guilty person from criminal and civil responsibility for the corruption offence.
- 11.4. The Bank takes strong disciplinary action against any employee of the Bank who has committed a corruption offence.
- 11.5. Employees of the Bank who have committed a corruption offence may be deprived of certain rights based on order of court in accordance with the legislation, including the right to hold a certain position.

12. Final provisions

- 12.1. This Policy comes into force upon approval by SB of the Bank. All amendments and additions to it are approved by SB of the Bank.
- 12.2. The contents of this Policy should be delivered to the information of each employee of the Bank in the manner prescribed by the Bank's internal documents and procedures. Control over familiarization with the provisions of this Policy is vested in the direct heads of the Bank's structural units and branches.
- 12.3. The responsibility for monitoring and updating this Policy is vested in Compliance control department of the Bank.
- 12.4. This Policy should be posted on the website of the Bank.
- 12.5. The Management board of the Bank is responsible for observance of the requirements of this Policy, and CCD is responsible for maintaining this Policy in accordance with the requirements of the legislation of RU.
- 12.6. Procedures and provisions not regulated by this Policy are implemented in accordance with the legislative and regulatory acts of RU and internal documents of the Bank.
- 12.7. If the current legislation of RU or the Charter of the Bank establishes other norms than those provided for by this Policy of the Bank, the current legislation of RU and the norms of the Charter of the Bank shall apply.

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Attachment #1 – Obligation to comply with the legislation of RU in the area of combating corruption and the requirements of Anti-corruption Policy

OBLIGATION

observance of the legislation of RU in the area of counteraction of corruption, as well as with the requirements of Anti-corruption Policy

I, _____

(name of department, division, unit, branch, position, full name must be indicated in full)
as an employee of JSCMB "Ipoteka-bank", I am obliged:

- to comply unconditionally with the requirements of the internal labor regulations of the Bank, performance discipline, corporate standards of the Bank, Code of business conduct and corporate ethics of employees of the Bank;
- to execute honestly and in good faith the job descriptions and official responsibilities imposed on me during work;
- not to interfere in relations between the Bank and the customer not related directly to my job responsibilities (loan issue, foreign exchange operations, etc.), in matters of employment in the Bank and transfer from one position to another, etc.;
- to fully execute orders, instructions and other regulatory documents related to banking secrecy, trade secrecy, official secrecy and other information and documents protected by law, as well as not to disclose to other persons such information that became known to me in the performance of my duties;
- in the process of working activity, not to abuse and not to use for personal purposes my official position, not to allow cases of corruption, bribery, extortion and other negative circumstances.

I am warned that if I violate my obligations undertaken, I can be dismissed from my position, as well as involved to criminal responsibility under articles #167, 168, 177, 205, 209, 210, 212, etc. of Criminal code of the Republic of Uzbekistan.

I have fully read this commitment, I understand its nature and content, and I have signed it of my own free will, understanding the implications thereof.

« ____ » _____ 20__ year

(signature)

(full name)