



**"APPROVED" by
The minutes of the meeting
of the Supervisory Board
JSCMB "Ipoteka-Bank"
№34 dd.29.07.2022**

**WHISTLEBLOWING POLICY
OF JSCMB "IOTEKA-BANK"**

TASHKENT-2022

JSCMB “IPOTEKA-BANK”			
WHISTLEBLOWING POLICY OF JSCMB “IPOTEKA-BANK”			
<i>DIN: PT-22-18-03</i>	<i>Version №: 1.1</i>	<i>Effective date: 01.08.2022</i>	<i>Page №: 2</i>

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DOCUMENT REVISION CHRONOLOGY

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	Management Body	Date	
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Prepared by:		Date:	Signature:
Compliance Control Department		July 2022 г.	
Agreed with:			
Legal Department		July 2022	
Committee for Audit, Anti-Corruption and Ethics		July 2022	
Version №	Date of issue	Effective date	Brief description of the changes made
1.0	Jul 26, 2021	Aug 1, 2021	Policy developed
1.1	Jul 29, 2022	Aug 1, 2022	Policy was brought in line with the requirements of the Guidelines for the Development, Adoption and Revision of the Bank's Internal Regulations, Section "Terms, Abbreviations and Definitions" was supplemented with the terms of Applicant, IRD, Officials, Committee for Audit, Anti-Corruption and Ethics under the Supervisory Board, and Section "Final Provisions" was revised.

DOCUMENT ACCESS CONTROL

Control and storage of the document is carried out in accordance with the table below:

№	Document Holder (Position)	Document format
1	Corporate Consultant Service	Original in PDF
2	Compliance Control Department,	Original in Word
3	Electronic library of internal regulatory documents of the Bank	Copy in PDF

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1 TERMS, ABBREVIATIONS AND DEFINITIONS

№	Abbreviations	Definitions
1	JSCMB "Ipoteka-bank" / Bank	Joint-Stock Commercial Mortgage Bank "Ipoteka-bank"
2	Internal regulatory documents/ IRD	An internal regulatory document - multiple use, developed and approved by the relevant management body of the Bank and designed to regulate the internal activities of the Bank.
3	Official	Officials of the Bank are members of the Supervisory Board, the Board of the Bank, as well as employees whose official duties allow them to make decisions regarding the activities of the Bank and / or exercise a significant influence on the activities of the Bank
4	Legislation of the Republic of Uzbekistan	Laws of the Republic of Uzbekistan, decrees and resolutions of the President of the Republic of Uzbekistan, resolutions of the Cabinet of Ministers of the Republic of Uzbekistan, as well as legal acts regulating banking activities, including regulatory legal acts of the Central Bank of the Republic of Uzbekistan
5	Prohibited Practices	Corruption, coercion, collusion, fraud, money laundering, terrorist financing, and financing the proliferation of weapons of mass destruction.
6	Applicant	An individual or legal entity who addressing to the Bank with information about illegal or unethical actions in the activities of the Bank, including with the participation of the Bank's employees, customers or counterparties in prohibited practices or their misconduct
7	Committee/CAACE	Committee for Audit, Anti-Corruption and Ethics under the Supervisory Board of JSCMB "Ipoteka-bank"
8	SB	Supervisory Board of JSCMB "Ipoteka-bank"
9	Misconduct	Behavior of the Bank's employees that violates or contradicts the requirements of the corporate ethics of the Bank.
10	Policy	Whistleblowing Policy of JSCMB "Ipoteka-bank"
11	Management Board	The executive body of the Bank, whose work is regulated by the Charter of JSCMB "Ipoteka-bank", Regulations on the Management Board of JSCMB "Ipoteka-bank" and other internal regulatory documents of the Bank
12	RU	The Republic of Uzbekistan
13	Reporting on violation	Information providing to the Bank via publicly available communication channels or by personal appeal containing facts of illegal or unethical actions in the Bank's activities, including the participation of Bank employees, customers, or counterparties in prohibited practices or their misconduct
14	Structural units of the Bank	Department, division and unit of the Bank

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№	Abbreviations	Definitions
15	Authorized person of the Bank	An authorized person means Director of Compliance Control Department and Chairperson of Committee for Audit, Anti-Corruption and Ethics in this Policy
16	CBU	The Central Bank of the Republic of Uzbekistan

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2 GENERAL PROVISIONS

2.1. This Whistleblowing Policy at JSCMB "Ipoteka-bank" was developed in order to establish the procedure for appropriate reporting, including anonymous, about violations committed by employees of JSCMB "Ipoteka-bank", with subsequent procedures for investigation and documentation.

2.2. This policy supplements, but does not replace, other reporting mechanisms, including in the order of appeal of individuals and legal entities in accordance with the legislation of the Republic of Uzbekistan.

2.3. This Policy, telephone number, postal address, email address and telegram channel/bot intended for receiving reports of violations are posted on the Bank's web-site at: <https://www.ipotekabank.uz/contacts/hq/>.

3 EXTENSION OF SCOPE

3.1. This Policy applies to all employees of the Bank without exception, and is also addressed to third parties and is aimed at solving problems that may have a negative impact on the Bank's activities, including:

- 3.1.1 violation of the requirements of regulatory legal acts of the Republic of Uzbekistan, including international agreements of the Republic of Uzbekistan, as well as internal regulatory documents of the Bank;
- 3.1.2 manifestation of dishonest, corrupt, fraudulent and other unlawful or unethical behavior, including extortion, receiving and giving bribes;
- 3.1.3 obstruction of conducting internal or external audits;
- 3.1.4 violation related to bookkeeping and preparation of financial statements;
- 3.1.5 conflict of interest;
- 3.1.6 illegal distribution of confidential information;
- 3.1.7 other activities of an unacceptable nature (discrimination, violation of human rights, etc.).

3.2. This list is not exhaustive and only provides examples of actions that could be considered violations.

3.3. This Policy:

- does not apply to those cases in which someone maliciously raises an intentionally unfounded suspicion;
- does not apply when considering appeals under the Law of the Republic of Uzbekistan "On Appeals of Individuals and Legal Entities".

4 REGULATORY FRAMEWORK

4.1 Law of the Republic of Uzbekistan "On Banks and Banking Activity";

4.2 Law of the Republic of Uzbekistan "On Joint-Stock Companies and Protection of Shareholder Rights";

4.3 Law of the Republic of Uzbekistan "On Appeals of Individuals and Legal Entities";

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- 4.4 Law of the Republic of Uzbekistan "On Combating Corruption";
- 4.5 Regulation on corporate governance in commercial banks;
- 4.6 Code of Corporate Governance of JSCMB "Ipoteka-bank";
- 4.7 Regulation on information policy of JSCMB "Ipoteka-bank";
- 4.8 Compliance Policy of JSCMB "Ipoteka-bank";
- 4.9 Policy of prevention and elimination of conflicts of interests of JSCMB "Ipoteka-bank";
- 4.10 Anti-Fraud Policy of JSCMB "Ipoteka-bank";
- 4.11 Anti-Corruption Policy of JSCMB "Ipoteka-bank";
- 4.12 Code of Business Conduct and Business Ethics of JSCMB "Ipoteka-bank";
- 4.13 Regulations on Compliance Control Department.

5 GOALS AND OBJECTIVES OF THE POLICY

- 5.1. This Policy is adopted for the following goals:
 - 5.1.1 formation of a culture of transparency in the Bank, designed to prevent illegal or unethical actions;
 - 5.1.2 providing to all employees of the Bank the opportunity to inform about the offense under the conditions of guaranteed anonymity of the applicant;
 - 5.1.3 detection, prevention and suppression of cases of illegal or unethical actions in the activities of the Bank.
- 5.2. The main objectives of the Policy are:
 - 5.2.1 establishing the procedure and rules for informing, receiving and considering reports on violations;
 - 5.2.2. creation of effective mechanisms, procedures, control and other measures aimed at counteracting illegal or unethical actions in the activities of the Bank;
 - 5.2.3. formation of intolerance to all manifestations of illegal or unethical actions in the activities of the Bank;
 - 5.2.4. formation among the employees of the Bank, customers and counterparties of a common understanding of the principles of this Policy.

6 PROCEDURE FOR RECEIVING A REPORT ON VIOLATION

- 6.1. The Applicant has the right to freely inform, by anonymous or personal appeal, about the facts of illegal or unethical actions in the activities of the Bank, about the participation or suspicion of participation of the Bank, its employees, in any prohibited practices and misconduct through the following communication channels:
 - 6.1.1 postal address: 30, Shakhrisabz street, Mirzo-Ulugbek district, 100000 Tashkent;
 - 6.1.2 phone number: +998 78 1508968;

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6.1.3 e-mail address: whistleblowing@ipotekabank.uz;

6.1.4 telegram channel/bot: @Compliance_control_bot.

6.2 When submitting a report on a violation (in person, in writing, online or by phone), the Applicant should provide as much detail as possible so that authorized person of the Bank can assess the situation and conduct an audit, including:

6.2.1 general information, background of the question, the reason of the problem;

6.2.2 names, dates, places and other information relevant to the question;

6.2.3 positions, name of the employees of the Bank related to the report;

6.2.4 documents confirming the facts stated in the report on the violation, other evidence (if any).

7 CONFIDENTIALITY, ANONYMITY AND WARRANTIES

7.1 The applicant can provide his or her information or can remain anonymous.

7.2 All reports received under this Policy are confidential. This means that information is only disclosed to a limited number of people and only on the basis of strict adherence to the principle of work necessity.

7.3 Information may be disclosed only to a limited number of persons and only when it is necessary to conduct an investigation of the possible violation. Information may go beyond this limited number of persons only if the disclosure of data is required in accordance with the legislation of the Republic of Uzbekistan and the internal regulatory documents of the Bank.

7.4. By implementing this Policy, the Bank guarantees:

7.4.1 confidentiality of the Applicant's information;

7.4.2 consideration of cases of persecution and / or discrimination of Applicants and ensuring their protection within the framework of the legislation of the Republic of Uzbekistan and the Bank's IRD;

7.4.3 refusing to conceal the evidence supporting the information contained in the report of violation;

7.4.4 taking appropriate measures against persons who destroyed or concealed evidence confirming the information contained in the report of the violation.

8 PROCEDURE FOR CONSIDERING REPORTS ON VIOLATION

8.1. Responsibility of the consideration of reports of violations, as well as organization of preliminary verification actions, initiation of an investigation on the facts of illegal or unethical actions in the activities of the Bank, participation or suspicion of participation of the Bank, its employees, in any prohibited practices and misconduct, is imposed to Director of the Compliance Control Department.

8.2. Responsibility of the consideration of a violation report, as well as organization of preliminary verification actions, initiation of an investigation on the facts of illegal or unethical actions in the activities of the Bank, participation or suspicion of participation in any prohibited practices and misconduct of members of the Management Board of the Bank or employees of Compliance Control Department is imposed to CAACE. In the event that the report on the violation contains insufficient

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information, the authorized person of the Bank has the right to request the missing information from the Applicant, if he is not anonymous.

8.3. An Authorized person has the right to request, on a confidential basis, from interested structural units of the Bank the necessary information or documents related to the content of the report on the violation accepted for consideration.

8.4. For the purpose of objective and comprehensive consideration of the report, the Authorized person of the Bank can request a written explanation from the Bank employee against or in relation to whom the report on violation was provided, as well as consolidate the documents received from him, confirming his explanations and / or refuting the content of the report, if any.

8.5. If, at the stage of initial inquiries, an Authorized person of the Bank reveals that the information contained in the report of the violation has no basis, or this issue does not require consideration in accordance with this Policy, then it may be rejected at this stage, and the decision is documented and submitted for consideration by CAACE.

8.6. The authorized person of the Bank reserves the right not to conduct the verification or terminate it ahead of deadline and prepare an information to CAACE, if the report does not contain the information provided for in article 6.2 of this Policy, and there is no real possibility of obtaining more detailed information, including if the Applicant refuses to provide such clarifying information.

8.7. Where initial inquiries indicate that further review of a reported violation is necessary, then it should be dealt with fairly and objectively. Based on the results of consideration, an information is prepared and submitted for consideration of CAACE.

8.8. If necessary, the Authorized person of the Bank has the right to involve in the consideration of the facts stated in the report of violation, the heads of the structural units of the Bank, whose opinions will contribute to the investigation of the cases indicated by the Applicant.

8.9. Upon completion of the investigation, the Applicant is notified on the results of the consideration of the report on violation and the conducted verification (if it is possible to contact him).

8.10. The Committee must conduct a meeting in order to consider a report prepared by an Authorized person of the Bank based on the results of consideration of reports on the violations, and in case of confirmation of the fact of a violation, provide recommendations on involving of the relevant employees into the responsibility in accordance with the legislation of the Republic of Uzbekistan and the Bank's IRD, including disciplinary and administrative measures and etc.

8.11. Compliance Control Department quarterly informs CAACE and Supervisory Board of the Bank about the results of investigations carried out on the basis of the reports received from the Applicants, confirmed facts of violations, measures taken and persons involved into the responsibility in accordance with the legislation of the Republic of Uzbekistan and the Bank's IRD during the reporting period.

8.12. CAACE conducts control over the implementation of the provisions of the Policy by the Management Board of the Bank and the measures being taken by the Management Board of the Bank to eliminate confirmed violations and prevent their recurrence.

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8.13. The Bank informs the Applicant about the results of consideration of the report on violation (if the Applicant is not anonymous).

8.14. Based on the results of consideration of the reports on violations, the persons who have been found guilty will be subject to measures provided for by the legislation of the Republic of Uzbekistan and Bank’s IRD.

9. FINAL PROVISIONS

9.1. This Policy is approved by SB, comes into force from the moment of its approval and is valid until its cancellation. Approval of amendments and additions to this Policy is carried out by SB at the proposal of the Committee.

9.2. This Policy should be assessed for the relevance of the requirements set forth in it and compliance with the requirements of the legislation of the Republic of Uzbekistan and the Bank's IRD and revised in accordance with Revision Plan of IRD of Compliance Control Department, to be approved by the Committee on an annual basis.

9.3. In case if as a result of changes in the legislation of the Republic of Uzbekistan, certain articles of the Policy come into conflict with the norms of the legislation of the Republic of Uzbekistan, these articles become invalid and it should be guided by the legislation of the Republic of Uzbekistan until the relevant changes are included into the Policy.

9.4. If, as a result of amendments to the Bank's Charter, certain articles of the Policy come into conflict with it, these articles of the Policy become invalid, and the Charter should be followed until the relevant changes are included into the Policy.

9.5. In all cases not stipulated by this Policy, the provisions of the Bank's Charter and the norms of the current legislation of the Republic of Uzbekistan are applied.