

"APPROVED"
Protocol of the Supervisory Board
of Uzbekgeofizika JSC
July 25, 2023

**UZBEKGEOFIZIKA JOINT STOCK COMPANY
ANTI-CORRUPTION
POLICY**



Tashkent-2023

I. General provisions

1.1. The Anti-corruption Policy (hereinafter referred to as the Policy) of Uzbekgeofizika Joint Stock Company (hereinafter referred to as the Company) is implemented in order to increase the level of anti-corruption culture among the Company's employees, commitment to high ethical standards for employees of the Company and its structural divisions, and also reflects intolerance and prevention of corruption offenses in the activities of the Management Body and the Supervisory Board, It also defines standards for protecting the Public's interests.

1.2. This Policy has been developed in accordance with the requirements of the Law of the Republic of Uzbekistan "On Combating Corruption" dated January 3, 2017 No. 419, Decrees of the President of the Republic of Uzbekistan "On additional measures on improvement of the anti-corruption system in the Republic of Uzbekistan" dated June 29, 2020 No. UP-6013, "On measures to create an environment of intolerant attitude to corruption". corruption, drastic reduction of corruption factors in state and public administration, as well as broad involvement of the public in this process" dated July 06, 2021 No. UP-6257, Resolutions of the President of the Republic of Uzbekistan "On additional measures for effective organization of anti-corruption activities "dated July 06, 2021 No. 5177, "On measures to improve the effectiveness of anti-corruption activities". mechanisms for eliminating corruption risks in the field of public administration and expanding public participation in this area" dated May 11, 2022 No. 240, and in accordance with the Decree of the President of the Republic of Uzbekistan "On measures for effective organization of the activities of the State Asset Management Agency" dated March 24, 2023 No. PP-101, as well as recommendations of the Anti-Corruption Agency international organizations in the field of anti-corruption and international best practices, including: ISO 37001: 2016 "Anti-corruption management system-Requirements and recommendations for their application" - taking into account the requirements and recommendations of the international standard.

1.3. The main objective of the company is to generate income by conducting geophysical research at oil and gas fields in the territory of the Republic of Uzbekistan and abroad in order to replenish the mineral resource base.

1.4. Geological exploration works (two-dimensional (2D) and three-dimensional (3D) seismic exploration, vertical seismic profiling (VSP), electrical exploration) and mining geophysics performed within the framework of state programs and additional contracts of Uzbekgeofizika JSC are considered. Provider of comprehensive geophysical services (well geophysics, core analysis, reserve calculation, etc.).

1.5. This Policy requires the Company's employees to comply with anti-corruption legislation.

This Policy comes into force after it is approved by the Company's Supervisory Board.

1.6. The main task of the Anti-Corruption Society is to:

- implementation of measures to prevent corruption in all areas of the Company's activities;
- improving the legal awareness and legal culture of employees, forming an intolerant attitude towards corruption;
- achieving a radical elimination of corruption in Society and its structural divisions;
- timely detection and suppression of corruption offenses, eliminating the consequences, causes and conditions that led to the commission of corruption offenses, ensuring the principle of inevitability of responsibility for the commission of corruption offenses;
- compliance with the requirements of the Legislation of the Russian Federation international standard ISO 37001:2016 "Anti-corruption management system", as well as continuous improvement of the anti-corruption management system.

1.7. The requirements of this Policy apply equally to all employees of the Company, regardless of their position and functions.

1.8. Members of the Supervisory Board and the Company's management body undertake to comply with the requirements of this Policy and continuously improve the anti-corruption

management system.

1.9. In order to achieve the above-mentioned main objectives, as an internal document of the Company, the Policy defines the main requirements and principles aimed at preventing and suppressing corruption offenses in the Company's activities and its structural divisions.

1.10. The scope and range of persons covered by the anti-corruption Policy are employees of the Company, as well as employees of structural divisions, regardless of their position, tasks and functions performed, members of the management body and the Supervisory Board are considered employees.

Any person applying for a job in the Company and its structural divisions (on a permanent, temporary, or contractual basis) is bound to read this Policy by signing it and comply with all its rules.

1.11. For the purposes of this Policy, the following basic concepts and terms are used:

interested persons – persons participating in the authorized capital of commercial organizations together with their employees, with the exception of persons holding less than five percent of the shares of joint - stock companies whose shares are traded on the Republican Stock Exchange;

state bodies and institutions-state authorities and management bodies, citizens ' self-government bodies (including ministries, services, agencies, etc.). centers, etc.) and their constituent subdivisions, as well as legal entities directly or indirectly controlled by the state;

corruption - illegal use of official position in personal interests or in the interests of other persons in order to obtain material or non-material benefits, as well as illegal provision of such benefits;

corruption risk – the risk of corrupt actions of employees of the Company or third parties on behalf of the organization or in their interests;

corrupt actions - the employee of a material interest, directly or indirectly, personally or through third parties in an action or omission in the interests of the giver, including cash, securities, and other forms of property and property rights, obtaining, extortion, collection of property-related services, illegal use of their duties for suggestions or villas, cottages and (or) receiving a bribe or mediation them, charging for facilitation (bribery) and other illegal purpose;

corruption offense behavior with signs of corruption, responsibility for which is set by the legislation of the Republic of Uzbekistan;

division of internal anti-corruption control is a structural unit, which is responsible for combating corruption in the Society;

a system of management protivodeystviya korrozii - a set of measures to prevent violations of anti-corruption legislation of the Republic of Uzbekistan and internal documents of the company on the issues of anti-corruption enforcement of the employees of its activities on high professional and behavioral level;

will cronysim - (form of favoritism based on friendly relations) – the use of power and/or reputation for providing illegal benefits to friends or agents;

officer appointed or elected on a permanent, temporary or ad hoc basis, acting as representative bodies of power or performing organizational and administrative, administrative tasks and legal responsibilities of state bodies, local authorities, irrespective of the form of ownership, enterprises, institutions and organizations; the person authorized to commit the important action, the person performing these tasks in an international organization or in the legislative, Executive, administrative or judicial body of a foreign state.

conflict of interest - a situation in which personal interest (direct or indirect) affects or may affect the proper performance of official or official duties by a person and in which there is or may be a contradiction between personal interest and the rights and legitimate interests of citizens, organizations, society or the state.

localism means working only for local interests. At the same time, a person is hired, rotated, and appointed to a position regardless of whether he meets the qualification requirements for the position due to his origin (a representative of a noble or well-known

dynasty and the fact that he is publicly recognized) and the official position held by his close relatives.

nepotism - (acquaintance, nepotism, the appearance of favoritism on the basis of family ties) - the use of power and (or) influence in order to provide illegal benefits to one's close relatives or friends, as well as the accrual of unjustified remuneration to close relatives and (or) friends, the appointment of close relatives and friends to the detriment of public interests;

payments for simplification of formalities - funds, property, property rights, services and other materials provided illegally, not provided for by the relevant legislation and regulatory norms and rules, in order to ensure or speed up the implementation of these procedures or standard procedures related to the performance of actions and intangible benefits;

Hospitality signs related to business activities - expenses of third parties related to: with the establishment of cooperation and / or its support, aimed at increasing the loyalty of the Company's employees and in the interests of the Company's employees, including expenses related to meals of third parties, organization of lunches related to work, transport expenses, accommodation, entertainment, including expenses related to tourist programs, etc.;

expenses – expenses related to the official reception of representatives (participants) (breakfast, lunch or similar event), their transportation, buffet during negotiations, payment for translation services not at the expense of the Company's employees.

Business gift – any gift presented by an employee of the Company to a counterparty and/or other third party on behalf of and/or at the expense of the Company, as well as a gift accepted by the Company or its employee by the counterparty and other third parties.

Business events – events within the framework of the Company's work (reception of delegations, meetings, round tables, forums, conferences, etc.) and similar events.

Entertainment events – mass events within the scope of the Company's activities (including: cultural, sports, and others).

Business hospitality signs – expenses incurred by third parties in carrying out activities or for the purpose of cooperation in the interests of employees, including: meetings, breakfasts, lunches, dinners, coffee breaks and negotiations, transportation costs, etc.

Counterparty – any individual, with the exception of employees, and/or legal entities (including their branch and / or representative office) entering into a contractual relationship with the Company.

kinship relations - personal interest of an employee of the Company in the form of subjective, privileged and biased attitude towards third parties based on belonging to the same dynasty;

favoritism - priority by an employee of the Company of the interests of one person and (or) a group of persons over the interests of another person and (or) a group of persons, selection and placement of personnel in the Company, promotion service, bonuses and submission to state awards, granting vacations or going to sanatorium-resort institutions and business trips abroad non-compliance with the order in situations related to the establishment of the order of consideration of dispatches, appeals, as well as work and duty schedules.

international organization - any international organization created by States, Governments or other international organizations, regardless of their organizational form and powers, including, for example, regional economic integration organizations.

employees – employees of the Company, members of the management body and the Supervisory Board who perform their duties on the basis of employment contracts based on the objectives of this Policy.

counterparty – any individual, with the exception of employees, or a legal entity (including its branch and/or representative office) that enters into a contractual relationship with the Company.

sponsorship – assistance provided by legal entities and individuals (sponsors) To the Company (sponsored institutions) by performing works for them, providing services and other types of support for charitable purposes, providing property, including monetary funds, as a

result of which mutual obligations to the sponsor arise in the Company's institutions;

charity (charitable assistance) - transfer by legal entities and individuals (benefactors) To the Company of material or non-material benefits, especially in monetary form, free of charge or on the basis of benefits, performing certain works for them, providing services and providing other support for charitable purposes. Voluntary selfless assistance, expressed in achievement;

patronage - patronage of an employee by another employee holding a higher position, in the form of creating favorable working conditions, intercession for him;

Political donations are monetary funds, material gifts, non-material goods or services donated or provided to a political party, politician or political candidate. Such contributions can be used to improperly influence political processes or decisions in order to gain illegal influence. The Company does not allow direct or indirect political donations under any circumstances;

Structural divisions – parties of direct subordination and branches of Uzbekgeofizika JSC;

close relatives - persons related to each other by kinship or close kinship, i.e. parents, biological and adopted brothers and sisters, spouse, children (including adopted children) grandparents, grandchildren, as well as parents of the husband (wife), biological and adopted siblings.

II. The basic principles of the fight against corruption

2.1. Companies implement the anti-corruption system based on the following principles:

Legality-Companies take measures to combat corruption taking into account the requirements of the legislation of the Republic of Uzbekistan, the internationally recognized practice of combating corruption in state bodies and in accordance with the established internal documents of the Company;

Intolerant attitude to corruption-Companies are intolerant of any forms and manifestations of corruption in all areas of their activities. Employees of the Company are prohibited from directly or indirectly participating in activities that may pose a risk of corruption;

openness and transparency - informing employees and contractors of the Company, the general public about the measures taken and implemented in the field of combating corruption in the Company and its structural divisions;

preventive, systematic and interrelated measures taken to combat corruption - Companies give priority to the implementation of preventive measures aimed at eliminating the causes and conditions that contribute to the commission of corruption actions and corruption risks. Anti-corruption measures and procedures correspond to the level of identified risks and are integrated into the anti-corruption system, integrated into all functions and areas of the Company;

inevitability of responsibility for corruption offenses - employees of the Company's system who have committed corruption offenses are responsible in accordance with the Company's internal documents and current legislation, regardless of their status and position;

use of technical achievements development – the Company's executive staff strives to use the latest scientific developments, including integrated information systems, when creating an anti-corruption system in its constituent divisions;

direct appeal to the management – each employee of the Company and its structural divisions can freely contact the head of the organization or the " Anti-Corruption and Compliance Control Department"

interaction with representatives of civil societyThe Company and its structural divisions engage civil society representatives on the basis of integrity, impartiality and independence;continuous improvement of the anti –corruption system – based on the

results of monitoring and control of the anti-corruption management system. measures are taken to continuously improve the effectiveness of the anti-corruption management system in the Company and its structural divisions.

III. Main directions of fighting corruption

3.1. Managing conflicts of interest

3.1.1. Employees of the Company and its structural divisions adhere to the principles of honesty and integrity in the performance of their official duties and in representing the interests of the Company, taking into account their personal interests, do not use their official position and property of the Company, avoiding situations that lead to conflicts of interest.

A conflict of interest arises in a situation that affects or may affect the proper and impartial performance of their official duties by employees of the Company, including the impartial decision-making, as well as the rights, legitimate interests, property and prestige of the Company.

3.1.2. In the event of a conflict of interest, an employee of the Company must immediately notify his/her direct supervisor or the "Anti-Corruption and Compliance Control Department" in writing.

3.1.3. Members of the management body and the Supervisory Board of the Company, employees of the Company and its structural divisions are required to disclose information about their personal interests that lead or may lead to a conflict of interests on an annual basis when applying for a job or transferring to another position and depending on the occurrence of the relevant circumstances.

3.1.4. The process of disclosure and resolution of information on conflicts of interest of the Company and its structural divisions is regulated by the "Policy on Conflict of Interest Management in Uzbekgeofizika JSC".

3.2. Business gifts and hospitality accept tokens

3.2.1. In exchange for employees of the company and its structural divisions performing or not performing their official duties in the interests of individuals and legal entities, they receive from them any gifts or hospitality tokens in the course of work, incentives in the form of loans, guarantees, sureties, remuneration, cash or their equivalent, securities. It is forbidden to accept financial support in the form of:

The Company prohibits giving gifts of any kind to officials of the Republic of Uzbekistan.

This category does not include gifts presented by an employee of the Company for special merits on the basis of a relevant decision of the state body, as well as gifts received as a result of awards for achievements in competitions, public holidays, celebrated dates and other official events.

3.2.2. Employees of the Company and its structural divisions may receive gifts in connection with business trips outside the territory of the Republic of Uzbekistan, international and other official events, as well as international and other official events held in the territory of the Republic of Uzbekistan. At the same time, the gift must comply with the legislative documents of the Republic of Uzbekistan, internal departmental documents of the Company and the requirements of this Policy, and should not cause a conflict of interest or risk of corruption, in particular, it should not create obligations affecting the impartial decision-making of the Company's employee.

3.2.3. If there are doubts about the legality of accepting gifts presented to them in connection with international or other official events, the company's employee must immediately inform his / her higher management or the "Anti-Corruption and Compliance Control Department" about this.

3.2.4. Presentation of gifts on behalf of the Company at international conferences, symposia and other business (official) events is carried out on behalf of the Chairman of the Management Board of the Company or his deputies. At the same time, you should take into account the requirements of the legislation of the recipient partner state.

3.2.5. Delivery of business gifts to officials of a foreign state is allowed only within the framework of official delegations and (or) international exhibitions (subject to compliance with the requirements of the legislation of a foreign state). The cost of such business gifts may be

limited in accordance with the requirements of foreign legislation.
3.2.6. Procedure and grounds for giving and receiving gifts in the company, participating in and organizing business events, as well as making representation expenses and accepting business hospitality signs in the community. Delivery and receipt of gifts, organization and participation in business events, representation is regulated by the "Cost Realization Policy".
3.3. Ensuring transparent and effective interaction with competent government agencies, contractors and third parties.
3.3.1. The Company will not involve suppliers, contractors and other third parties in making any payments or actions that contradict the principles and requirements of this Policy and the legislation of the Republic of Uzbekistan.
3.3.2. The Company adheres to the principles of legality and transparency in its relations with counterparties.
3.3.3. The company has implemented an honest, open and transparent process for selecting suppliers, contractors and other contractors based on objective criteria, as well as a transparent procedure for determining the cost of purchased goods and services, which is regulated by law. current legislation of the Republic of Uzbekistan and internal documents of the company.
3.3.4 When interacting with counterparties, the Company: in accordance with the Guidelines for checking counterparties in the company and the requirements of the legislation of the Republic of Uzbekistan, checks the reliability of the potential counterparty, including whether it was involved in corruption activities in the past, whether there is a conflict of interest with the Company's employees; informs the potential counterparty, including the winner of the procurement procedure, on its anti-corruption principles and requirements by including special anti-corruption provisions in the text of the agreement with it.
3.3.5. When interacting with competent state bodies (for example, when issuing a license, participating in specialized councils, approving various documents, objects, etc.), the Company ensures transparency and impartiality of the review of documents and, if necessary, justification. Additional information is required to obtain negative and other conclusions from these State bodies.
3.3.6. To ensure transparency and fairness in relations with counterparties, the fact that the initiator involved in the selection of the counterparty, or other employees of the Company or their close relatives work in the counterparty in senior positions or positions related to decision-making is used. as a reason for not entering into a contractual relationship with this counterparty, partner or third parties.
3.4. Transparency of charitable and sponsorship activities and ensuring an effective process
3.4.1 The Company may provide and receive charitable and sponsorship support in cases established by law. When implementing and receiving such assistance, all measures are taken to prevent conflicts of interest, ensure effective and targeted allocation of funds for the purposes specified in the legislation of the Republic of Uzbekistan or the agreement, as well as to disclose information about charitable and sponsorship activities on the Company's official website on the Internet.
3.4.2. Donations or sponsorship made or accepted by the Company should not take the form of hidden remuneration, and decisions should be made by individual employees of the Company in favor of the recipient of the donation and the donor or sponsor, his / her close relatives, persons associated with them, as well as persons with whom the donor or sponsor has a personal interest, should not influence your performance.
3.4.3 When the company provides and receives charitable or sponsorship assistance, the following requirements must be met: Mandatory conclusion of a contract with the donor or donor or sponsor and the purpose of providing or receiving the donation or sponsorship and its use, the forms of assistance, the amount of assistance in monetary terms, the method of reporting to the recipient, donor or

sponsor should indicate the intended use of the assistance received;
include anti-corruption provisions in such a contract;
Posting information about donations or sponsor's assistance, transferred or received, on the official website of the company on the Internet.

3.4.4. Charitable and sponsorship activities in Uzbekgeofizika JSC are regulated in accordance with the "Law on Protection of Joint-Stock Companies and Shareholders' Rights", as well as the Company's Charter and the Charity and Sponsorship Policy.

3.5. Anti-corruption expertise of internal documents

3.5.1. During the legal examination of internal documents, the Company's legal service conducts an expert examination for the presence of corruption factors that create opportunities for carrying out corrupt actions and excluding them from the documents.

3.6. Introduction of new technologies in the scope of the Company

3.6.1. In order to minimize corruption risks, the Company's employees perform their functions and duties using information technologies (if possible).

3.6.2. When bidding within the framework of public procurement, the Company uses information technologies and interacts with bidders in electronic form, using the possibility of integration with other electronic systems.

3.7. Video recording and broadcasting of public events

3.7.1. In order to monitor the activities of employees, video recording cameras are installed in the Company's buildings, the recordings of which are viewed by the Company's responsible employees.

3.7.2. Video recordings of interviews with candidates are stored in the HR department in accordance with the requirements of the Regulations on Admission to vacant positions in Uzbekgeofizika JSC, selection of employees based on selection when transferring to another position, interviews with applicants (employees) Company or other persons), meetings of the ethics committee and business partners. Video surveillance of negotiations is conducted for one month in the "Anti-Corruption and Compliance Control Department".

IV. Elements of the anti-corruption system

4.1. Availability of important internal anti-corruption documents

4.1.1. The basis of the anti-corruption system is:
Law of the Republic of Uzbekistan "On Combating Corruption "
this Policy;
Code of Ethics of the Company's Employees;
Principles and requirements reflected in the Regulation on the Procedure for managing conflicts of Interest in the Company.

4.1.2. The Management Board and Supervisory Board of the Company, as well as the heads of its structural divisions, must: show employees an example of high leadership.

4.1.3. The Management Board and Supervisory Board of the Company, as well as the heads of the Company's structural divisions, serve as an example of honest, fair and independent behavior in relations with subordinates, citizens and legal entities, thereby forming an uncompromising attitude to corruption actions.

4.1.4. The Management Board and Supervisory Board of the Company, as well as the heads of the Company's structural divisions, demonstrate leadership in creating and implementing an effective anti-corruption system by implementing effective anti-corruption measures and procedures for managing risks and functions (areas) of the Company's activities.

4.2. Identification and assessment of corruption risks

4.2.1. The Company identifies and evaluates corruption risks specific to its activities, taking into account the nature of the functions of structural subdivisions, interaction with the Company

and other persons, as well as taking into account external and internal factors in accordance with the "Methodology for Assessing Corruption Risks in Uzbekgeofizika JSC".

4.2.2. Corruption risk assessment is carried out at least once a year. The results of the corruption risk assessment are reviewed by the Chairman of the Company's Management Board. Anti-corruption measures and procedures that minimize identified risks are reflected in the Company's anti-corruption program or roadmap.

4.3. Anti-Corruption Officer

4.3.1. In order to form an effective anti-corruption system in the Company, the "Anti-Corruption and Compliance Control Department" has been established.

The "Anti-Corruption and Compliance Control Department" has the following powers and responsibilities:

- monitoring the development and implementation of the anti-corruption management system requirements in the Company;
- advising staff on the anti-corruption management system and issues related to corruption;
- ensuring compliance of the anti-corruption management system with the requirements of the international standard ISO 37001: 2016;
- reporting on the functioning of the anti-corruption management system to the Chairman of the Management Board and the Supervisory Board of the Company, as well as, if necessary, to other authorized bodies for ensuring regulatory compliance.

The "Anti-Corruption and Compliance Control Department" has the right to directly and promptly address the Chairman of the Management Board or the Supervisory Board of the Company if there is a need to consider at the highest level any issue or problem related to the anti-corruption management system.

4.3.2. "Anti-Corruption and Compliance Control Department" The Company operates on the basis of the "Regulations on the Anti-Corruption and Compliance Control Department" and reports to the Chairman of the Company's Management Board and the Supervisory Board.

4.3.3. The Chairman of the Management Board of the Company provides the "Anti-Corruption and Compliance Control Department" with sufficient independence and necessary resources to perform anti-corruption tasks.

4.3.4. "Department of Personnel Management, Training and Retraining" The Company is responsible for the systematic and timely collection, analysis and updating of information about close relatives of employees and related persons in accordance with the procedure and to the extent stipulated by the requirements of the "Policy on Conflict of Interest Management" in Uzbekgeofizika JSC, as well as the legislation of the Republic of Uzbekistan.

4.3.5. Separate ethics commissions operate in all structural divisions of the Company.

4.3.6. The Company's Ethics Committee reviews employees' compliance with the Code of Ethics, and also participates in the process of resolving situations related to conflicts of interest in the company, in accordance with the "Conflict of Interest Management Policy".

4.4. Ensuring that employees and third parties are informed about the Company's anti-corruption policy

4.4.1. In order to reduce corruption risks and raise awareness among employees, the Company publishes basic information about this Policy and the measures they implement to combat corruption on its official website.

4.4.2. The Company uses all its efforts and opportunities to communicate and explain to its employees and other interested parties the norms of the anti-corruption legislation of the Republic of Uzbekistan, as well as the introduced anti-corruption principles, the following measures and requirements:

The Company's management constantly sends messages on the importance of compliance by the Company's employees with the adopted anti-corruption norms and requirements through the official website and other means of information exchange;

ensure regular and systematic training and testing of the Company's employees at least once a year in accordance with the anti-corruption training plan;

give instructions (instructions) on anti

corruption issues. Anti-corruption training programs are established for positions with a high risk of corruption in the Company when they become familiar with this Policy and other internal anti-corruption documents of the Company. Information about the conducted training courses (trainings) is stored in the " Department for Management, Training and Retraining of Personnel" Of the Company in accordance with the procedure established by the legislation of the Republic of Uzbekistan;

organization of anti-corruption propaganda activities using audio and video clips on the topic and other informational materials aimed at raising awareness of the Company's employees and citizens about the measures taken to combat corruption and forming an intolerant attitude towards corruption;

advising the Company's employees with the structure of internal anti-corruption control if they have any questions implementation of the provisions of this Policy or implementation of anti-corruption measures and procedures;

active promotion of anti-corruption behavior in the Company by the internal anti-corruption control structure based on the approved plan;

inclusion of anti-corruption clauses in the employment contracts of employees of the Company and its structural divisions.

The Company will include an anti-corruption clause in the current employment contracts of employees as part of the review of the conditions of new employees of the Company from the moment of entry into force of this Policy.

Inclusion of anti-corruption clauses in contracts concluded with counterparties, partners, donors and sponsors of the Company.

The anti-corruption clause will be included in contracts with new counterparties, partners, donors and sponsors of the Company from the moment of entry into force of this Policy. The anti-corruption clause is included in all contracts of the Company with the exception of contracts concluded based on the results of purchases through (electronic store, electronic auction, and with state natural monopolies (post office, electricity, gas, water, railways, airlines, etc.)).

The anti-corruption clause will be included in contracts concluded prior to the adoption of this Policy, within the framework of review of the terms or on your own initiative.

4.5. Monitoring, control and accountability

4.5.1. The Anti-Corruption and Compliance Control Department continuously monitors, monitors and evaluates the effectiveness, adequacy and proportionality of the Company's anti-corruption procedures. Based on the results of the conducted monitoring, the Company will take appropriate measures to form an anti-corruption system.

4.5.2. Monitoring and control is carried out in accordance with the "Methodology for Monitoring and controlling the effectiveness of anti-corruption procedures" and other internal documents of the Company.

4.5.3. Monitoring of the anti-corruption system should be carried out in the following main areas:

The Company's functions are to control and issue permits, analyze the compliance of the procurement process with the legislation of the Republic of Uzbekistan;

Monitor legislation and recommendations of government authorities in the field of anti-corruption used in the activities of the Republic of Uzbekistan;

monitor recommendations of international and foreign organizations on the creation and support of an effective anti-corruption system;

monitor the mass media for The Company;

internal processes and functions on a selective basis in order to identify ineffective control mechanisms and procedures, improve them and ensure the reliability and effectiveness of the

anti-corruption system; Monitor the completeness and effectiveness of the Company's anti-corruption program and structural divisions; Verify compliance with the requirements of the Company's internal control system and its employees' access to corruption activities, as well as the same information about the Company's counterparties or partners;

Monitoring the completeness and effectiveness of the Company's anti-corruption program and its structural divisions;

anti-corruption requirements and procedures introduced by employees of the Company and structural divisions;

Checking the awareness of employees of the Company and structural divisions about the basic principles and requirements of anti-corruption.

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

4.5.5. The results of monitoring and control of the anti-corruption system are reflected in reports on the state of the anti-corruption system. The procedure for forming and submitting reports is set out in the internal document on forming and submitting reports on the state of the anti-corruption system in the Company .

4.6. Liability

4.6.1. Compliance with this Policy and the Company's anti-corruption requirements and procedures is the responsibility of each employee within the scope of their official duties. Employees are personally liable for violations of the anti-corruption requirements and procedures set out in this Policy and other internal documents of the Company.

4.6.2. In accordance with the zero tolerance principle for corruption, all employees of the Company are strictly prohibited from participating in any corrupt activity, directly or indirectly, personally or through intermediaries, namely;

illegal use of their position and official position, as well as demanding, extorting or extorting undue benefits from any persons for the purpose of abusing their official position and powers as well as giving or receiving consent to receive an illegal benefit from any person, as well as as committing an employee from his official position contrary to the legitimate interests of the Company, including illegal use for the purpose of obtaining an illegal benefit for himself or third parties;

encouraging a state official or other person to act (ensuring their inaction) or inducing them to illegally perform their official duties in order to obtain undue advantages in the interests of a person, including Society; offering undue benefits (bribes, bribes), promising to do so, giving permission, presenting them;

collecting, receiving or making payments to simplify formalities;

mediation in bribery or commercial bribery, including including transfer of illegal benefits to the recipient or assistance to the recipient or giver in reaching an agreement between them on receiving and providing illegal benefits;

Other actions or omissions of the Company's employees that have signs of corruption or serve to create a conflict of interests.

4.6.3. Employees are required to inform their manager and the Anti-Corruption and Compliance Control Department of the Company about all cases of corruption committed by persons who have applied to them in order to encourage them to commit corruption, as well as other employees known to them.

4.6.4. Taking into account the principle of zero tolerance for corruption, an internal audit is conducted in accordance with the regulations and other internal documents on conducting official inspections in the Company and its structural divisions, as well as in accordance with the requirements of the legislation of the Republic of Uzbekistan, for each reasonable suspicion of corruption committed by the Company's employees.

4.6.5. Employees of the Company and its structural divisions are responsible for violating

the anti-corruption requirements and procedures established by this Policy, anti-corruption legislation or other internal documents of the Company, regardless of the position held, length of service and other factors, within the framework of the legislation of the Republic of Uzbekistan and on the grounds provided for in them.

4.6.6. In case of detection of corruption actions, the Anti-corruption and Compliance Control Department analyzes the causes and possibilities of their occurrence and constantly improves the anti-corruption system.

4.6.7. The results of internal audits are constantly submitted to the Chairman of the Management Board of the Company and the Committee "Anti-Corruption and Ethics" under the Supervisory Board.

4.6.8. The Company cooperates with law enforcement and other state bodies in order to detect and investigate corruption offenses.

V. Reports of corrupt practices

5.1. If there are doubts about the legality or ethics of the Company's employees' actions, suspicions related to corruption or other violations, they can be reported through the following communication channels that are generally used by the Company:

- directly to the manager.
- Chairman of the Management Board of the Company;
- To the Chairman of the Company's Ethics Committee (tel. 71-286-24-06);
- via the hotline -71-264-84-05;
- by mail-100060, Tashkent highway, Mirzo Ulugbek district, Buyuk kelazhak str., 5 (tel. 71-264-84-94);
- Via the company's official website-<https://www.uzbekgeofizika.uz>; www.uzbekgeofizika.uz;
- directly to the "Anti-Corruption and Compliance Control Department". (phone: 99-370-01-07, e-mail-anticorruption@uzbekgeofizika.uz);
- Chairman of the Committee "Anti-Corruption and Ethics" under the Company's Supervisory Board;
- to a higher-level organization or law enforcement agencies through other communication channels not specified in this Policy.

5.2. The Company ensures confidentiality of information about the person who provided reasonable information about the violation, within the limits of its powers and available capabilities, except for cases stipulated by the legislation of the Republic of Uzbekistan.

5.3. The Company protects the interests of its employees and ensures that employees who report questionable behavior of other employees or possible violations of the anti-corruption requirements of this Policy are treated in good faith.

5.4. All communications received through the Company's communication channels are promptly and objectively reviewed by the Company's responsible persons in accordance with the legislation of the Republic of Uzbekistan, internal documents on receiving and reviewing communications received through communication channels intended to report corruption actions in the Company, and other internal documents of the Company.

5.5. Sending a deliberately false message by the Company's employees is considered a violation of the requirements of this Policy and an example of unethical behavior, and the person who reported it, in turn, may be held liable in accordance with the legislation of the Republic of Uzbekistan and internal documents of the Company.

VI . The procedure for making revisions and changes

6.1. This Policy may be revised and supplemented in the following cases:
when changing the anti-corruption legislation of the Republic of Uzbekistan, which creates the need to review existing anti-corruption policies and procedures;
when identifying ineffective anti-corruption control measures and procedures, as well as

when it is necessary to improve comprehensive measures aimed at preventing and combating corruption in the Company's activities;

When changing specific aspects of the Company's organizational structure or functions, etc.

6.2. Any changes to the policy will be approved by the Supervisory Board on the recommendation of the Committee "Anti-Corruption and Ethics", acting under the Supervisory Board of the Company.