APPROVED

By order of the director of
Korporativ Maslahat Tizimlari LLC

No. 5 of 14 July 2026

ANTI-CORRUPTION POLICY

in KORPORATIV MASLAHAT TIZIMLARI LLC

This Anti-Corruption Policy is a local regulatory act of KORPORATIV MASLAHAT TIZIMLARI LLC, mandatory for all employees of the Company.

Bukhara 2026

PASSPORT OF THE DOCUMENT

Document Name	Anti-corruption policy
Document Code	KMT-ACP-001
Version	1.0
Document Status	Current
Document Type	Local Regulatory Act
Organization	Korporativ Maslahat Tizimlari LLC
Scope	All structural divisions and employees of the Company
Approved	By Order of the Director of Korporativ Maslahat Tizimlari LLC No. 5 dated July 14, 2026
Enacted	July 15, 2026
Developed	Director of Korporativ Maslahat Tizimlari LLC
Reviewed	Director of Korporativ Maslahat Tizimlari LLC
Approved	Director of Korporativ Maslahat Tizimlari LLC
Next Revision	No later than January 1, 2029, or in the event of changes in the legislation of the Republic of Uzbekistan or the Company's internal requirements
Document Cancellation	Until replaced by a new version or cancelled by order of the Director
Number of Pages	35
Number of Appendices	3

Director's Address

Dear colleagues!

Korporativ Maslahat Tizimlari LLC operates in the fields of property and business valuation, business consulting, business plan development, feasibility studies, financial modeling, and investment project support.

Our work is based on legality, professional independence, objectivity, responsibility, and integrity. These principles enable us to maintain the trust of clients, banks, investors, government agencies, and business partners.

Corruption in any form is incompatible with our company's corporate values. We adhere to the principle of zero tolerance for corruption, exclude the use of official position for personal gain, and do not permit any actions that could compromise the independence of our professional decisions.

This Anti-Corruption Policy defines uniform rules and standards of conduct for the Company's employees, aimed at preventing corruption risks, preventing conflicts of interest, ensuring operational transparency, and protecting the Company's business reputation.

Each employee of the Company is personally responsible for compliance with the requirements of this Policy and is obligated to be guided by its provisions in the performance of their official duties.

We believe that maintaining high ethical standards, openness, honesty, and professionalism are essential for the sustainable development of the Company, strengthening customer trust, and furthering the company's growth.

I thank each employee for their responsible approach to their work, adherence to corporate values, and contribution to the development of Korporativ Maslahat Tizimlari LLC.

Director of
Korporativ Maslahat Tizimlari LLC

Our corporate principles

Korporativ Maslahat Tizimlari LLC carries out its activities based on the following principles:

- ✓ Compliance with the laws of the Republic of Uzbekistan;
- ✓ Zero tolerance for corruption;
- ✓ Professional independence;
- ✓ Objectivity and reliability of work results;
- ✓ Honesty and integrity;
- ✓ Transparency of decision-making;
- ✓ Respect for the rights and legitimate interests of clients;
- ✓ Prevention of conflicts of interest;
- ✓ Confidentiality of information;
- ✓ Personal responsibility of each employee.

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Chapter 1. General Provisions

Article 1. Subject of regulation

1. This Anti-Corruption Policy and the procedure for preventing corruption in KORPORATIV MASLAHAT TIZIMLARI LLC (hereinafter referred to as **the Policy**) defines the basic principles, requirements and measures aimed at preventing corruption, ensuring the fair conduct of the Company's activities, compliance with the legislation of the Republic of Uzbekistan and protecting the business reputation of the Company.
2. The Policy is a local regulatory act of the Company and is mandatory for all employees, regardless of the position they hold, the nature of the work performed, and the duration of the employment relationship.
3. The requirements of this Policy apply to all types of activities of the Company, including:

- property valuation;
- business valuation;
- valuation of intangible assets;
- assessment of equipment and vehicles;
- development of business plans;
- development of feasibility studies;
- financial modeling;
- investment consulting;
- strategic consulting;
- support of investment projects;
- other types of activities carried out by the Company.

Article 2. Objectives of the Policy

The main objectives of this Policy are:

1. prevention of corruption offenses;
2. ensuring compliance with the legislation of the Republic of Uzbekistan;
3. the formation in Society of an intolerant attitude towards any manifestations of corruption;
4. ensuring the independence of professional activities of employees;
5. prevention of conflicts of interest;
6. ensuring the objectivity of the results of assessment and consulting activities;
7. protection of the property interests of the Company;

8. protection of the business reputation of the Company;
9. increasing the confidence of clients, partners, banks, investors and government agencies in the Company's activities.

Article 3. Legislative basis

This Policy has been developed in accordance with:

- Law of the Republic of Uzbekistan "On Combating Corruption";
- Labor Code of the Republic of Uzbekistan;
- Civil Code of the Republic of Uzbekistan;
- Law of the Republic of Uzbekistan "On appraisal activities";
- other regulatory and legal acts of the Republic of Uzbekistan.

If an international treaty of the Republic of Uzbekistan establishes rules other than those provided for in this Policy, the rules of the international treaty shall apply in cases stipulated by the legislation of the Republic of Uzbekistan.

Article 4. Basic principles

The company operates on the basis of the following principles:

Legality

All decisions are made in strict accordance with the legislation of the Republic of Uzbekistan.

Zero tolerance for corruption

The Company does not allow any manifestations of corruption, regardless of the size of the potential benefit, the position held by the employee, or other circumstances.

Integrity

Every employee is obliged to perform his duties honestly, reasonably and professionally.

Independence

Employees make professional decisions independently, without any undue influence from clients, government agencies, contractors, or other persons.

Objectivity

The results of assessments, expert opinions and consulting services must be based solely on legislation, professional standards, factual data and documented information.

Transparency

All significant decisions must be documented and made in accordance with established internal procedures.

Each employee is personally responsible for compliance with the requirements of the legislation of the Republic of Uzbekistan and this Policy.

Article 5. Scope of the Policy

1. The requirements of this Policy are mandatory for:

- Directors of the Company;
- all employees of the Company;
- employees performing the functions of appraisers;
- employees providing consulting services;
- employees hired under fixed-term employment contracts.

2. When concluding civil law contracts, the Company has the right to stipulate the obligation of contractors to comply with the requirements of this Policy.

Article 6. Obligation to comply with the Policy

1. Each employee is obliged to familiarize themselves with this Policy before beginning their job duties.
2. Employees are required to:

- comply with the requirements of this Policy;
- not to commit actions that could damage the business reputation of the Company;
- inform management about any known facts of possible corruption violations;
- take measures to prevent conflicts of interest;
- facilitate the conduct of internal audits in cases provided for by this Policy.

3. Ignorance of the requirements of this Policy does not relieve the employee from liability for their violation.

Article 7. Main directions of implementation of the Policy

To achieve the objectives of this Policy, the Company implements:

- prevention of corruption risks;
- prevention of conflicts of interest;
- ensuring the independence of the professional activities of appraisers and consultants;
- compliance with legal requirements when interacting with clients, government agencies and contractors;
- consideration of reports of possible violations;
- conducting internal audits if there are appropriate grounds;
- taking measures to eliminate the identified violations.

Chapter 2. Basic concepts and organization of work to prevent corruption

Article 8. Basic concepts

The following key concepts are used in this Policy:

Corruption is the illegal use by an employee of his official position for the purpose of obtaining material or non-material benefits for himself or third parties, as well as the illegal provision of such benefits to the said person.

A conflict of interest is a situation in which an employee's personal interest influences or may influence the objective and conscientious performance of his or her official duties.

Personal interest is the possibility of an employee, his close relatives or persons associated with him receiving property or other benefits as a result of the employee's performance of his official duties.

An employee is a person who is in an employment relationship with the Company, regardless of the position held and the nature of the work performed.

Client – an individual or legal entity to whom the Company provides services or intends to provide them.

Counterparty – an individual or legal entity with whom the Company has entered into or intends to enter into contractual relations.

A gift is property, money, services, property rights or other tangible or intangible assets transferred free of charge or on preferential terms.

State body – a state body, state institution or other organization that carries out public functions in accordance with the legislation of the Republic of Uzbekistan.

Other concepts are used in the meanings established by the legislation of the Republic of Uzbekistan.

Article 9. Organization of work to prevent corruption

1. The organization of work to prevent corruption is carried out by the Director of the Company.
2. To coordinate corruption prevention activities, the director may, by order, appoint an employee responsible for organizing work to prevent corruption.
3. The absence of a designated responsible person does not relieve employees from the obligation to comply with the requirements of this Policy.
4. Each employee is obliged to participate in the implementation of this Policy within the scope of his/her job responsibilities.

Article 10. Powers of the Director

Director of the Company:

- ensures compliance with the requirements of the legislation of the Republic of Uzbekistan in the field of combating corruption;
- approves this Policy and amendments thereto;

- makes decisions on issues of corruption prevention;
- considers reports of possible violations or assigns their consideration to a responsible person;
- takes measures to eliminate identified violations;
- ensures that employees are familiar with this Policy;
- makes decisions on conducting an internal audit if there are appropriate grounds.

Article 11. Person responsible for organizing work to prevent corruption

1. The person responsible for organizing work to prevent corruption is appointed by order of the director.
2. The person in charge may be assigned the following functions:

- consulting employees on the application of this Policy;
- acceptance of notifications of conflicts of interest;
- registration of reports of possible violations;
- maintaining the logs provided for in this Policy;
- preparing proposals for the director on improving work to prevent corruption;
- participation in internal audits on behalf of the director.

3. The responsible person acts within the powers granted by the director.

Article 12. Duties of employees

Every employee is obliged to:

- comply with the legislation of the Republic of Uzbekistan;
- comply with the requirements of this Policy;
- act honestly, conscientiously and professionally;
- not to use official position for personal gain;
- immediately report any known instances of possible corruption violations;
- report any conflict of interest;
- refuse to carry out an illegal order;
- do not make decisions influenced by personal interests;
- facilitate the conduct of internal audits in cases provided for by this Policy.

Article 13. Employees' Rights

The employee has the right:

- receive clarification on the application of this Policy;
- refuse to carry out an illegal order;

- report possible violations without fear of retaliatory measures being taken against him;
- contact the director or the responsible person for clarification on issues of corruption prevention;
- make suggestions for improving this Policy.

Article 14. Main responsibilities of managers

Heads of structural divisions (if any) are required to:

- ensure compliance with this Policy by subordinate employees;
- consider incoming requests within the limits of their authority;
- promptly inform the director of any identified violations;
- take measures to prevent conflicts of interest;
- Do not allow pressure to be exerted on employees when they perform their professional duties.

Chapter 3. Requirements for employee behavior and prohibitions

Article 15. General requirements for the behavior of employees

1. Employees of the Company are obliged to carry out their professional activities in good faith, honestly, objectively and exclusively in the interests of the Company, its clients and in accordance with the legislation of the Republic of Uzbekistan.
2. When performing their official duties, employees are required to:

- comply with the legislation of the Republic of Uzbekistan and local regulations of the Company;
- act independently and impartially;
- be guided by the principles of professional ethics;
- prevent the occurrence of situations that could damage the business reputation of the Company;
- make decisions solely on the basis of legislation, professional standards and reliable information;
- ensure the safety of official information and documents;
- promptly report any known facts of possible violations of the law or this Policy.

3. Employees are required to refrain from any actions that may cast doubt on their objectivity, independence or integrity.

Article 16. Inadmissibility of corrupt actions

Employees of the Company are prohibited from directly or indirectly:

- offer, promise, give or receive bribes;
- demand or accept illegal remuneration;
- use intermediaries to commit corrupt acts;
- use official position for personal gain;
- provide or receive improper advantages;
- participate in schemes aimed at concealing corrupt activities;
- commit other actions that contain signs of corruption offenses.

Article 17. Prohibition of abuse of official position

Employees are prohibited from:

- use official powers for personal gain;
- use the property, funds or other resources of the Company for personal purposes, unless this is provided for by internal documents;
- use official information for personal interests or for the interests of third parties;
- make decisions based on personal interest.

Article 18. Inadmissibility of illegal remuneration

Employees are prohibited from:

- receive money, property, services or other valuables for the performance or non-performance of their official duties;
- accept any remuneration not provided for in the employment contract or internal documents of the Company;
- receive commission from clients, suppliers, contractors, banks, insurance companies or other persons without the written consent of the director;
- accept hidden discounts, bonuses, gift certificates or other benefits related to the performance of official duties.

Article 19. Inadmissibility of exerting undue influence

Employees are prohibited from:

- incline other employees to violate the law or this Policy;
- give illegal instructions;
- demand changes in the results of professional activity without legal grounds;
- put pressure on employees when they make professional decisions;
- use employees' official dependence for personal gain.

Article 20. Good faith in working with documents

Employees are obliged to ensure the accuracy of the documents they prepare.

It is prohibited:

- to forge documents;
- to knowingly provide false information;
- change documents without proper grounds;
- hide documents or destroy them in violation of established procedures;
- use forged documents.

Article 21. Use of official information

1. Employees are required to use official information solely for the performance of their official duties.
2. It is prohibited:

- transfer confidential information to third parties without legal grounds;
- use official information for personal gain;
- use customer information for their own interests;
- disclose information constituting a commercial secret of the Company or the client, except in cases stipulated by the legislation of the Republic of Uzbekistan or the agreement.

Article 22. Inadmissibility of discrimination and favoritism

When making management decisions, it is prohibited:

- provide unreasonable advantages to individuals;
- make decisions based on personal relationships;
- give preference to relatives, friends or other related persons;
- create artificial advantages when selecting suppliers, contractors or performers.

Article 23. Prohibition on concealing violations

Employees are prohibited from:

- conceal information about corruption violations that have become known;
- destroy or hide documents that are relevant to the audit;
- obstruct the conduct of an internal audit;
- induce other employees to conceal violations;
- provide false explanations during an internal audit.

Article 24. Obligation to report violations

If an employee becomes aware of facts that may indicate:

- corruption;
- conflict of interest;
- illegal remuneration;
- abuse of official position;
- falsification of documents;
- attempt to exert pressure;
- other violations of this Policy,

He is obliged to notify the Director of the Company or the person responsible for organizing work to prevent corruption about this within a reasonable time.

Article 25. Personal example of leaders

1. The Company's managers are obliged to demonstrate by their behavior their commitment to the principles of legality, integrity and non-acceptance of corruption.
2. Managers are prohibited from requiring employees to perform actions that contradict the legislation of the Republic of Uzbekistan, this Policy or professional standards.
3. A manager does not have the right to apply disciplinary measures to an employee solely because of his refusal to carry out an illegal order or report a possible violation.

Chapter 4. Features of the implementation of appraisal and consulting activities

Article 26. General requirements for the implementation of professional activities

1. The Company's employees are obliged to carry out assessment and consulting activities independently, objectively and in good faith.
2. When performing professional duties, employees are guided by:

- legislation of the Republic of Uzbekistan;
- national assessment standards (if applicable);
- terms of the concluded agreement;
- this Policy;
- internal documents of the Company;
- professional techniques and generally accepted practices.

3. The employee's professional opinion must be based solely on factual circumstances, the results of the analysis and documented information.

Article 27. Independence of professional opinion

1. The employee is obliged to maintain independence of professional judgment in the performance of each task.
2. No one has the right to demand that an employee change the results of an assessment, the conclusions of an expert opinion, a financial model, a business plan, a feasibility study, or other results of professional activity without legal and documented grounds.
3. Any interference with the professional opinion of an employee aimed at achieving a predetermined result is prohibited.

Article 28. Inadmissibility of influencing the assessment results

Employees are prohibited from:

- change the value of the assessed object at the client's request;
- determine the value of an object before conducting analysis and calculations;
- select evaluation methods in order to obtain a predetermined result;
- exclude information that affects the final cost of the property;
- use unreliable or unverified source data;
- change the appraisal report without objective and documented grounds.

Article 29. Independence of consulting services

1. When providing consulting services, employees are required to provide objective and professionally sound recommendations.
2. It is prohibited:

- artificially inflate the financial performance of the project;
- artificially lower costs;
- conceal significant project risks;
- include in documents information that is not supported by calculations;
- prepare documents that could mislead clients, banks, investors, government agencies or other users.

Article 30. Interaction with clients

1. Employees are required to build relationships with clients based on the principles of legality, good faith, mutual respect and professional independence.
2. When interacting with clients, the following is prohibited:

- promise to achieve a predetermined result;
- guarantee a certain value of the appraised object;

- guarantee the receipt of a loan, investment, government support or other decisions from third parties;
- make decisions influenced by personal interest;
- receive remuneration from the client that is not provided for in the contract.

3. The employee is obliged to explain to the client that the result of the assessment or consulting opinion is determined solely on the basis of legislation, professional standards and the results of the analysis carried out.

Article 31. Provision of reliable information

1. When preparing reports, opinions, business plans, feasibility studies, financial models and other documents, employees are required to use reliable information.
2. If the information provided by the client is insufficient or there is reason to doubt its veracity, the employee is obliged to:

- request additional documents or information;
- indicate any restrictions associated with the use of the information provided;
- If it is impossible to obtain the necessary data, inform the manager about this and decide on the possibility of further completing the task.

Article 32. Attempts to exert undue influence

1. In the event of an attempt to exert pressure from a client, counterparty, government agency or other person, the employee is obliged to:

- refuse to comply with an illegal demand;
- not to enter into agreements that contradict the law or this Policy;
- immediately notify the Director of the Company or the person responsible for organizing work to prevent corruption.

2. An attempt to exert undue influence includes, but is not limited to:

- a proposal to change the results of the assessment or advisory opinion;
- offer of monetary reward;
- offer of gifts or other benefits;
- threats of termination of cooperation;
- threats of filing complaints if an illegal demand is refused;
- other actions aimed at obtaining a predetermined result.

Article 33. Refusal to comply with an unlawful demand

1. The employee is obliged to refuse to comply with the requirement if its fulfillment:

- contradicts the legislation of the Republic of Uzbekistan;

- violates this Policy;
- requires the preparation of false documents;
- associated with the concealment of material information;
- aimed at obtaining an undue advantage.

2. An employee's refusal to comply with an illegal requirement cannot be grounds for applying disciplinary measures against him.

Article 34. Storage of working materials

1. Working materials used in the assessment, preparation of reports and other documents shall be stored in accordance with the requirements of the legislation of the Republic of Uzbekistan, the terms of the agreement and the internal rules of the Company.
2. Employees are prohibited from destroying, altering or concealing work materials without legal grounds.

Article 35. Protection of professional reputation

1. Each employee is obliged to take measures to preserve the business reputation of the Company.
2. Employees are prohibited from:

- commit actions that may cast doubt on the independence of the Company;
- use the name of the Society for personal gain;
- make knowingly false statements about the results of their work or the activities of the Company;
- commit other actions that may cause damage to the business reputation of the Company.

Chapter 5. Conflicts of Interest, Gifts, and Business Hospitality

Article 36. General Provisions

1. The Company takes measures to prevent, promptly identify and resolve conflicts of interest that may affect the objectivity of employees in the performance of their official duties.
2. Every employee is obliged to act in the interests of the Company and not allow situations in which his personal interests may influence the decisions he makes.
3. The employee is obliged to immediately inform the director of the Company or the person responsible for organizing work to prevent corruption about the occurrence or potential occurrence of a conflict of interest.

Article 37. Situations that may lead to a conflict of interest

A conflict of interest may arise if an employee:

- participates in the assessment of one's own property;
- participates in the assessment of the property of his close relatives;
- participates in the assessment of the property of an organization in which he or his relatives are owners, participants or managers;
- provides services to an organization in which he has a property interest;
- receives personal compensation from the client;
- participates in the selection of a supplier with whom he has personal or property relations;
- uses official information for personal purposes;
- makes decisions that may bring him or persons associated with him material or other benefits.

The presence of these circumstances does not always mean that a violation has occurred, but it does require mandatory notification and assessment of a possible conflict of interest.

Article 38. Employee responsibilities in the event of a conflict of interest

The employee is obliged to:

- immediately notify the Director of the Company or the responsible person;
- provide reliable information about the circumstances that have arisen;
- refrain from making an independent decision on the relevant issue until receiving instructions from the manager;
- implement the decision made by the manager to resolve the conflict of interest.

Article 39. Settlement of conflicts of interest

Depending on the circumstances, the Director of the Company has the right to make one or more of the following decisions:

- assign the task to another employee;
- limit employee participation in decision-making;
- exercise additional control over the execution of the task;
- refuse to perform the contract;
- take other measures necessary to ensure the objectivity and independence of the Company's activities.

Article 40. Gifts and other benefits

1. Employees are prohibited from receiving money, property, services or other benefits from clients, contractors, representatives of government agencies or other interested parties if their receipt is related to the performance of official duties.
2. Receiving gifts is not permitted if it may:

- influence the employee's objectivity;
- create a conflict of interest;
- be perceived as a reward for making a certain decision;
- call into question the independence of the Society.

Article 41. Acceptable signs of business attention

1. Receipt or delivery of souvenirs or other signs of business attention shall not be considered a violation of this Policy if the following conditions are simultaneously met:

- they have a symbolic character;
- are consistent with generally accepted business practices;
- do not imply any counter-obligations;
- do not affect the objectivity of decisions made;
- do not contradict the legislation of the Republic of Uzbekistan.

2. If any doubts arise, the employee is obliged to refuse the gift or inform the director of the Company about it.

Article 42. Prohibition of receiving illegal remuneration

Employees are prohibited from:

- receive funds in addition to the established salary and other payments provided for by the internal documents of the Company;
- accept remuneration for changing the results of an assessment or advisory opinion;
- receive commission from clients, banks, suppliers, contractors or other persons without the written consent of the director;
- use one's official position to obtain property or other benefits.

Article 43. Business hospitality

1. Employees may participate in official business events organized by clients, contractors or government agencies if such events are of a business nature.
2. Participation in events is not permitted if they:

- pursue the purpose of exerting undue influence;
- accompanied by the provision of excessive material advantages;
- may call into question the worker's independence.

3. Expenses for employees' participation in business events are incurred in accordance with the internal rules of the Company and the requirements of the legislation of the Republic of Uzbekistan.

Article 44. Duties of the Director

The Director of the Company is obliged to:

- review notifications of conflicts of interest;
- make decisions on their settlement;
- ensure objectivity in the consideration of received information;
- Do not allow the application of retaliatory measures to an employee who has reported a conflict of interest in good faith.

Article 45. Register of notifications of conflicts of interest

1. All notifications of conflicts of interest are subject to registration.
2. Registration is carried out in the Conflict of Interest Notification Log.
3. The journal is maintained by the person responsible for organizing work to prevent corruption or by the director of the Company.

Chapter 6. Interacting with Clients

Article 46. Basic principles of interaction with clients

1. The Company interacts with clients on the principles of legality, integrity, professional independence, objectivity, transparency, and mutual respect.
2. When providing services, the Company's employees are obliged to act exclusively in accordance with the legislation of the Republic of Uzbekistan, the terms of the contract, professional standards and this Policy.
3. When interacting with clients, actions that could create a conflict of interest, affect the independence of the professional opinion of employees, or lead to corruption are not permitted.

Article 47. Informing clients about the Company's anti-corruption policy

1. The Company has the right to inform clients about the current Anti-Corruption Policy and the basic principles of corruption prevention applied in the course of its activities.
2. By decision of the Company, the text of the Anti-Corruption Policy or information about it may:

- be posted on the official website of the Society;
- provided to the client before the conclusion of the contract;

- be sent together with the draft agreement;
- be included in the tender documentation;
- provided in other ways that do not contradict the legislation of the Republic of Uzbekistan.

3. At the client's request, the Company provides the opportunity to become familiar with the current version of the Anti-Corruption Policy.

Article 48. Unacceptable actions when interacting with clients

1. Employees of the Company are prohibited from:

- promise the client a predetermined result of the work;
- guarantee the achievement of a certain value of the appraised object before the completion of all necessary research and calculations;
- change the results of the assessment, expert opinion, business plan, feasibility study, financial model or other documents under the influence of the client or other interested parties;
- receive funds, property, services or other benefits not provided for by the agreement or the legislation of the Republic of Uzbekistan;
- conceal circumstances that could affect the objectivity of the work performed.

2. Employees of the Company are obliged to refuse to fulfill the client's demands if such demands contradict the legislation of the Republic of Uzbekistan, the terms of the agreement or this Policy.

Article 49. Actions of the Company upon identification of corruption risks

1. In the event that circumstances are identified that indicate a possible violation of the legislation of the Republic of Uzbekistan or the requirements of this Policy when interacting with a client, the Company has the right to:

- request additional documents or information;
- offer the client to eliminate the identified circumstances;
- suspend the execution of works until the circumstances are clarified;
- refuse to fulfill certain client requirements that are contrary to law;
- take other measures aimed at preventing corruption risks.

2. The adoption of these measures is carried out in compliance with the legislation of the Republic of Uzbekistan and the terms of the concluded agreement.

Article 50. The Company's right to refuse to conclude or execute an agreement

1. The company has the right to refuse to conclude an agreement or to further execute the agreement in cases stipulated by the legislation of the Republic of Uzbekistan and the terms of the agreement, if:

- the client demands actions that are contrary to the legislation of the Republic of Uzbekistan;
- the client requires the preparation of documents containing false information;
- the client demands changes to the assessment results, expert opinion or other documents without legal grounds;
- the client offers the Company's employees money, property, services or other benefits with the aim of influencing the results of the work performed;
- further performance of the agreement is impossible without violating the requirements of the legislation of the Republic of Uzbekistan or this Policy.

2. Refusal to conclude or execute an agreement shall be carried out in accordance with the procedure established by the legislation of the Republic of Uzbekistan and the terms of the relevant agreement.

Article 51. Anti-corruption obligations in contracts

1. In order to prevent corruption offenses, the Company has the right to include anti-corruption conditions (anti-corruption clauses) in contracts with clients, contractors, suppliers and other counterparties.
2. Anti-corruption conditions may include, in particular:

- the obligation of the parties to comply with the legislation of the Republic of Uzbekistan in the field of combating corruption;
- refusal of the parties to offer, promise, transfer or receive unlawful remuneration;
- the obligation of the parties to immediately inform each other of any known facts of corruption violations related to the execution of the contract;
- the right of a party to refuse to perform the contract in cases and in the manner stipulated by the legislation of the Republic of Uzbekistan and the contract, in the event of a material breach of anti-corruption obligations by the other party.

3. The decision to include an anti-corruption clause in a specific agreement is made by the Company taking into account the nature of the services provided, the level of corruption risks and the requirements of the legislation of the Republic of Uzbekistan.

Chapter 7. Reporting Violations and the Procedure for their Consideration

Article 52. Right and obligation to report violations

1. An employee who has become aware of facts or circumstances indicating a possible violation of the legislation of the Republic of Uzbekistan or this Policy is obliged to report this to the Director of the Company or the person responsible for organizing work to prevent corruption.
2. Employees also have the right to report actions that may lead to corruption violations, even if the violation has not yet been committed.
3. A report of a possible violation is considered as the employee fulfilling his job responsibilities and cannot be grounds for applying unfavorable measures against him.

Article 53. Grounds for notification

The basis for the message may be information about:

- offering or receiving an illegal reward;
- attempt to induce an employee to commit illegal acts;
- conflict of interest;
- abuse of official position for personal gain;
- forgery of documents;
- concealment of information that is important for completing the task;
- exerting pressure on an employee;
- other actions that violate the requirements of the law or this Policy.

Article 54. Notification procedure

1. The message can be made:

- orally;
- in writing;
- via corporate email;
- in any other way that allows information to be conveyed to the Director of the Company or the person responsible for organizing work to prevent corruption.

2. If possible, it is recommended to include in the message:

- description of circumstances;
- date and place of the event;
- information about known participants;
- available documents or other supporting materials.

3. The absence of certain information is not grounds for refusing to consider the message.

Article 55. Consideration of messages

1. Each received message is subject to review by the Director of the Company or the person responsible for organizing work to prevent corruption.
2. When reviewing a message, the following may be considered:

- the necessary documents have been requested;
- written explanations from employees were received;
- the circumstances relevant to the decision-making process have been studied;
- An internal audit was conducted.

3. Based on the results of the review, one of the following decisions is made:

- the violation was not confirmed;
- the violation was confirmed in whole or in part;
- further verification required;
- Materials are subject to transfer to government agencies in cases stipulated by the legislation of the Republic of Uzbekistan.

Article 56. Confidentiality

1. Information about the person who reported a possible violation is not subject to disclosure, except in cases stipulated by the legislation of the Republic of Uzbekistan.
2. The verification materials are used solely for the purpose of reviewing the report and making an appropriate decision.
3. Employees involved in the consideration of the report are obliged to maintain the confidentiality of the information received.

Article 57. Protection of workers

1. An employee who has reported a possible violation in good faith may not be subject to disciplinary action, dismissal, transfer to a lower-paid job, or other adverse consequences solely in connection with such a report.
2. If the information is not confirmed as a result of the investigation, but the report was made in good faith and based on information available to the employee, no liability will be applied to him.
3. This article shall not apply to cases where it is established that the message contained knowingly false information and was aimed at causing harm to another person or the Company.

Article 58. Internal audit

1. If there are sufficient grounds, the director has the right to decide to conduct an internal audit.

2. The purpose of an internal audit is to establish factual circumstances and make an informed decision.
3. When conducting an inspection, the following principles must be observed:

- legality;
- objectivity;
- impartiality;
- confidentiality;
- respect for workers' rights.

4. The investigation is carried out to the extent necessary to establish the circumstances of a particular case.

Article 59. Message Registration Log

1. Reports of potential violations are subject to registration in the Message Registration Log.
2. The journal indicates:

- serial number;
- date of receipt of message;
- summary;
- decision taken;
- date of completion of the review.

3. The journal is maintained by the person responsible for organizing work to prevent corruption or by the director of the Company.

Chapter 8. Interaction with government agencies, clients and business partners

Article 60. General principles of interaction

1. The Company interacts with government agencies, local government bodies, government institutions, clients, counterparties, banks, judicial authorities, notaries, international organizations and other business partners based on the following principles:

- legality;
- openness;
- good faith;
- professional independence;
- mutual respect;

- inadmissibility of corruption.

2. When interacting, employees are obliged to comply with the requirements of the legislation of the Republic of Uzbekistan, this Policy and other local regulations of the Company.

Article 61. Interaction with government agencies

1. When interacting with government agencies, the Company's employees are obliged to:

- act within the limits of the powers granted;
- provide reliable information and documents;
- comply with the requirements of the legislation of the Republic of Uzbekistan;
- comply with the legal requirements of government officials.

2. Employees are prohibited from:

- offer, promise or give money, property, services or other advantages to public officials in order to influence their decisions;
- use intermediaries to achieve illegal goals;
- provide knowingly false information or documents;
- conceal information that is required to be provided in accordance with the law.

Article 62. Interaction with clients

1. When providing services, the Company's employees are obliged to adhere to the principles of independence, objectivity and professional integrity.

2. Employees are prohibited from:

- promise the client a certain value for the appraisal object before all necessary research and calculations are completed;
- ensure that the client achieves the assessment result desired by the client;
- change the results of the assessment, conclusions of the expert opinion, business plan, feasibility study or other documents under the influence of the client or other interested parties;
- receive remuneration for changing the results of the work performed;
- make decisions that contradict the legislation of the Republic of Uzbekistan and professional standards.

3. If a client's demands arise that contradict the legislation of the Republic of Uzbekistan or this Policy, the employee is obliged to refuse to fulfill them and notify the Director of the Company thereof.

Article 63. Interaction with business partners and contractors

1. The selection of suppliers, contractors and other counterparties is based on objective criteria, including quality, cost, business reputation, experience and ability to properly fulfill obligations.
2. When selecting a counterparty, it is prohibited:

- provide unreasonable advantages to individuals;
- make decisions influenced by personal interest;
- receive remuneration or other benefits from potential or existing counterparties;
- to conclude contracts in circumvention of established internal procedures.

3. In the presence of circumstances that could affect the objectivity of the decision-making, the employee is obliged to notify the Director of the Company in the manner established by this Policy.

Article 64. Participation in public procurement and competitive procedures

1. When the Company participates in public procurement, competitions, tenders and other selection procedures, employees are obliged to comply with the requirements of the legislation of the Republic of Uzbekistan and the conditions of the relevant procedure.
2. Employees are prohibited from:

- use illegal means to gain advantages;
- enter into agreements that restrict fair competition;
- submit false documents or information;
- commit actions aimed at unlawfully influencing the results of a procurement or competition.

Article 65. Interaction with banks and financial organizations

1. When preparing documents for banks, leasing companies, investment funds and other financial organizations, employees are required to ensure the completeness, accuracy and objectivity of the information provided.
2. It is prohibited:

- include knowingly false information in documents;
- conceal circumstances of material importance;
- change the results of the assessment or advisory opinion at the request of interested parties without legal grounds;
- use fictitious or unconfirmed calculations.

Article 66. Representation of the interests of the Company

1. Employees represent the interests of the Company only within the limits of the powers granted to them.
2. Employees are prohibited from:

- to accept obligations on behalf of the Company without the appropriate authority;
- use the company name, business reputation or documents of the Company for personal purposes;
- make statements on behalf of the Company on matters not within their competence.

Article 67. Documentation of significant decisions

1. All significant decisions made in interactions with clients, government agencies and business partners must be documented.
2. In particular, the following are subject to documentary registration:

- changes in the terms of the contract;
- changes in the volume of services provided;
- refusal to perform the contract;
- refusal to comply with an illegal demand of a client;
- Client requests to change the assessment results or advisory opinion.

3. Documents are subject to storage in accordance with the procedure established by the legislation of the Republic of Uzbekistan and the internal documents of the Company.

Chapter 9. Liability and Final Provisions

Article 68. Liability for violation of the requirements of this Policy

1. Employees of the Company are obliged to comply with the requirements of this Policy.
2. Violation of the requirements of this Policy is considered a violation of labor duties and may entail the application of liability measures in accordance with the legislation of the Republic of Uzbekistan, local regulations of the Company and the terms of the employment contract.
3. Depending on the nature and consequences of the violation, disciplinary, material, administrative, civil or criminal liability measures may be applied to the guilty persons in cases and according to the procedure stipulated by the legislation of the Republic of Uzbekistan.
4. The application of liability measures is carried out in compliance with the requirements of the labor legislation of the Republic of Uzbekistan.

Article 69. Consideration of violations of this Policy

1. Each instance of possible violation of this Policy shall be subject to review by the Director of the Company or a person authorized by him.
2. If necessary, the director has the right to decide to conduct an internal audit.
3. Before a decision is made, the employee must be given the opportunity to submit written explanations, unless otherwise provided by the legislation of the Republic of Uzbekistan.
4. When considering the circumstances of the violation, the following are taken into account:

- nature of the violation;
- reasons and circumstances of its commission;
- consequences of violation;
- presence or absence of intent;
- measures taken by the employee to prevent or eliminate the consequences of the violation;
- other circumstances that are important for decision-making.

Article 70. Familiarization of employees with this Policy

1. All employees of the Company are required to familiarize themselves with this Policy.
2. Familiarization is carried out:

- when applying for a job;
- when approving a new version of the Policy;
- when making changes and additions to the Policy, if such changes affect the rights and obligations of employees.

3. The fact of familiarization is confirmed by the employee’s personal signature or by another means that allows confirmation of familiarization in accordance with the legislation of the Republic of Uzbekistan.

Article 71. Amendments and additions

1. This Policy is revised as necessary.
2. The grounds for making changes are:

- changes in the legislation of the Republic of Uzbekistan;
- change in the organizational structure or types of activities of the Company;
- identifying the need to improve internal procedures;
- results of the analysis of the practical application of this Policy.

3. Changes and additions are approved by order of the Director of the Company.

Article 72. Storage of the Policy

1. The original of this Policy is stored in the Company in the manner established for storing local regulations.
2. Employees are provided with the opportunity to familiarize themselves with the current version of the Policy.
3. The electronic version of the Policy may be posted in the Company's internal information system or stored in another location accessible to employees.

Article 73. Entry into force of the Policy

1. This Policy is approved by order of the Director of the Company.
2. The policy comes into force on the date of its approval, unless another period is established by the relevant order.
3. From the moment this Policy comes into force, all employees of the Company are obliged to be guided by its requirements in the performance of their official duties.

Final Provisions

This Policy is the main internal document of the Company, defining the principles of preventing corruption and mandatory requirements for the behavior of employees in the performance of professional activities.

All issues not regulated by this Policy shall be resolved in accordance with the legislation of the Republic of Uzbekistan and other local regulations of the Company.

Appendix No. 1

to the Anti-Corruption Policy of KORPORATIV MASLAHAT TIZIMLARI LLC

Conflict of Interest Notification Form

KORPORATIV MASLAHAT TIZIMLARI LLC
from _____
job title _____
structural division _____
telephone _____

NOTIFICATION
on the occurrence (possibility of occurrence) of a conflict of interest

In accordance with the requirements of the Anti-Corruption Policy of KORPORATIV MASLAHAT TIZIMLARI LLC, I hereby report the occurrence (possibility of occurrence) of a conflict of interest.

1. Description of circumstances

2. Date of occurrence of circumstances

3. Persons involved in the situation

4. Possible impact on the performance of job duties

5. Proposed measures for settlement (if any)

Applications (if any):

Date " " _____ 20
Signature _____

Director's decision
□ There is no conflict of interest
□ Measures to resolve the issue are required
□ Further investigation of the circumstances is required
Solution:

Date " " _____ 20

Signature _____

Appendix No. 2

to the Anti-Corruption Policy of KORPORATIV MASLAHAT TIZIMLARI LLC

Conflict of Interest Notification Log

No.	Date of registration	Full name of the employee	Summary of the notification	The decision taken	Execution date	Note
1						
2						
3						
4						
5						

The journal is maintained by the director of the Company or by a person appointed by the director’s order as responsible for organizing work to prevent corruption.

Appendix No. 3

to the Anti-Corruption Policy of KORPORATIV MASLAHAT TIZIMLARI LLC

Logbook of reports of possible violations of the Anti-Corruption Policy requirements

No.	Date of receipt	Method of receiving the message	Summary	Responsible for review	The decision taken	Date of completion of review	Note
1							
2							
3							
4							
5							