

Appendix 24 to the minutes of  
the meeting No. 4 of the  
Supervisory Board of JSC  
NMMC dated June 7, 2024

**APPROVED** by the minutes of  
the meeting No. 4 of the  
Supervisory Board of JSC  
NMMC dated June 7, 2024

**REGULATIONS**  
**for the receipt and consideration of messages received by JSC NMMC and its units via  
communication channels on cases of corruption, transparency and violations of  
monopoly legislation**

**Chapter 1. General provisions**

1. This Regulation was developed in order to create an environment intolerant of corruption in JSC NMMC (hereinafter referred to as the Company) and its structural divisions, to prevent conflicts of interest, to take effective measures to protect persons who report corrupt practices, transparency and monopoly in the interests of the Company, and to regulate other relations related to their protection and to take appropriate measures of influence.

2. This Regulation establishes the basic principles of working with reports received by the Company's employees on violations of the legislation of the Republic of Uzbekistan on combating corruption and the requirements of the Company's internal departmental documents on corrupt practices, openness and monopoly, conflicts of interest, as well as violations of the requirements of the Code of Ethics, as well as the procedure for receiving, registering and considering reports, as well as submitting reports to the Company's management.

3. For the purposes of these Regulations, the following basic concepts and terms are used:

**Report on a corruption offense** (hereinafter referred to as a report) - an oral, written or electronic application containing information about an act that has signs of corruption and for which the law provides for liability;

**Corruption** - the unlawful use of a person's position or office for personal gain or for the benefit of others, as well as the unlawful presentation of such gain;

**Corrupt practices** - the act or omission of an employee, directly or indirectly, personally or through third parties, to obtain a material benefit for the interests of the briber, including receiving, demanding, extorting, offering or giving money, securities, other forms of property, property rights, services of a proprietary nature, giving and/or receiving bribes or

intervening in such acts, extorting payments for the simplification of formalities (bribes), and the illegal use of one's official duties for other illegal purposes;

**Corruption offense** - an act with signs of corruption, for which liability is established by the legislation of the Republic of Uzbekistan;

**legislative documents on ensuring openness** - improving public control by ensuring openness and transparency of the activities of state bodies and organizations, freedom of access to information, as well as laws and by-laws in the field of openness, including internal departmental documents;

**monopoly** - a form of market organization based on [exclusive dominance](#) in one sector of the economy ;

**Conflict of interest** - a situation in which a person's personal (direct or indirect) interest affects or may affect the proper performance of his or her position or official duties, and a conflict arises (existing conflict of interest) or may arise (potential conflict of interest) between personal interest and the rights and legitimate interests of citizens, organizations, Society or the state;

**Hotline** - A system that allows for centralized reception, classification, and systematization of telephone calls to the public, as well as monitoring their timely and high-quality consideration;

**Whistleblower** - any individual or legal entity who applies to provide information about corrupt practices and other violations of the law in the Society through communication channels;

whistleblower is obliged to report suspected cases of misconduct that have been committed or may be committed , or any actions that harm or may harm the mission and reputation of the Society.

**Confidentiality of the informant - non** -disclosure of information about the identity of the informant or other information that must be kept confidential to third parties;

**third parties** - subjects in civil law who are not directly involved in civil legal relations, but who to a certain extent create rights and obligations in the legal relationship that has arisen. In relations with third parties, it is necessary to ensure that conflicts of interest are not allowed, as well as the non-disclosure of confidential and trade secret information;

**Relevant message** - a message containing information about corrupt practices in society, actions related to transparency and monopoly, conflicts of interest, requirements of the Code of Ethics and other violations of the law;

**employee** - an individual who has entered into an employment relationship with the Company; **personal interest of an employee** - the possibility of obtaining personal benefit in the form of money, tangible or intangible assets, other property and benefits (personal, social, financial, political and other commercial or non-commercial interests) that may affect the proper performance of the employee's professional or service duties in the interests of himself or third parties during the performance of his official duties;

4. The Society organizes the work of communication channels intended to provide information about corrupt practices based on the following principles:

**Confidentiality and security** - all authorized persons of the Company who are authorized to use messages in communication channels do not have the right to provide (disclose) these messages to unauthorized persons. If the sender discloses the fact of sending his message to other employees or third parties at his own discretion, including as a result of negligence, the Company is not responsible for its disclosure;

**legality** - Reception, registration, processing and consideration of messages received by the Company's communication channels are carried out strictly in accordance with the requirements of the legislation of the Republic of Uzbekistan, internal departmental documents of the Company and these Regulations;

**non-persecution of the whistleblower** - an individual or legal entity, in particular an employee of the Company, who voluntarily reports corrupt acts through communication channels, shall not be held liable for any action, regardless of the content of the report and the fact of corruption, if it was reported in good faith for an impartial purpose, but regardless of whether this fact is confirmed;

**whistleblower harassment** means any direct or indirect harm or harmful action suggested, threatened or taken against the whistleblower as a result of engaging in protected activities. Harassment may include , but is not limited to, demotion, salary adjustment, demotion or transfer, and dismissal ;

**mandatory feedback to the whistleblower** - if the report is not anonymous, the results of its consideration must be communicated by the Company to the whistleblower;

**impact measures** - if the fact of corruption is confirmed, the Company will act in accordance with the legislation of the Republic of Uzbekistan to bring the guilty persons to justice;

**state bodies and organizations** - state bodies, local executive authorities, state institutions, state unitary enterprises, state trust funds with the status of a legal entity, as well as economic entities in whose authorized capital the state's share is 50 percent or more, and legal entities in whose authorized capital (authorized capital) the share of these economic entities is 50 percent or more;

**employer** - a person who has entered into labor relations with individuals, performs general organizational, managerial, administrative and economic functions in enterprises, institutions, organizations, regardless of their form of ownership, and is authorized to perform actions of legal significance;

**Compliance Service** - A structure responsible for early detection and prevention of corruption cases in society, elimination of their causes and conditions, prevention of conflicts of interest, and taking measures to form a non-compromising attitude towards corruption.

## **Chapter 2. Basic principles of whistleblower protection.**

5. The main principles of whistleblower protection are as follows:

legality ;

consider messages as being in the public interest;

protection ;

impartiality ;

confidentiality of information about the whistleblower ;

Respecting the honor and dignity of the informant .

## **Chapter 3. Powers of the Compliance Service to Protect Whistleblowers**

6. The Compliance Service, within the scope of its powers established by law and the Company's internal documents, shall:

protects the personal and professional reputation of the whistleblower ;

participates in taking measures to ensure the confidentiality of the identity of the informant and the message received ;

whistleblower , take measures to contact a higher authority, an anti-corruption agency, or state bodies providing protection;

whistleblower ;

cooperates with other state bodies and organizations on whistleblower protection issues;

whistleblower is not disclosed.

have other powers in accordance with legislative acts .

## **Chapter 4. Whistleblower Rights**

7. The whistleblower has the following rights:

require the provision of personal and property security;

filing an application for the application or cancellation of protective measures;

by law on one's own initiative, in agreement with the bodies providing protection;

to learn about the application of protective measures and their nature from state bodies providing protection ;

Requesting protective measures for close relatives; Obtaining legal advice from state bodies that provide whistleblower protection;

state bodies, actions (inaction) of officials, violations of labor legislation; to keep the source of reported or disclosed information confidential; to receive psychological assistance;

To apply to court without paying the state fee in order to recover material and moral damage caused to oneself as a result of reporting .

The whistleblower shall be exempted from liability for acts committed under duress or threat in accordance with the procedure established by the legislative acts of the Republic of Uzbekistan.

The whistleblower may also have other rights in accordance with legislative acts .

## **Chapter 5. Obligations of the whistleblower**

### 8. Reporter:

to comply with decisions made by authorized state bodies and the Company, as well as their legal requirements;

immediately notify the competent state bodies and the Company's Compliance Service of any threat or illegal action or inaction made against him/her ;

not to disclose information about the protective measures applied to him/her ;

reporting and must not intentionally or out of personal enmity harm the reputation and social status of other individuals.

The whistleblower may also have other obligations in accordance with legislative acts .

## **Chapter 6. Employer's rights**

### 9. The employer has the following rights:

of the report , hold the guilty employees accountable for direct actual damage;

whistleblower , in order to prevent actions that degrade his honor and dignity;

cooperate with other government agencies and organizations on whistleblower protection issues ;

whistleblower within the scope of authority.

## **Chapter 7. Obligations of the employer**

### 10. The employer is obliged to:

received message is registered in the appropriate manner, reviewed within the established deadlines, and appropriate measures are taken;

whistleblower ;

the personal and professional reputation of the whistleblower ; prevent the whistleblower from being subjected to unjustified disciplinary action, termination of his/her employment contract or transfer to another job, demotion, discrimination, pressure, and other forms of harassment;

whistleblower and not to limit the promotion in rank or category ;

Failure to redistribute, transfer, or shirk responsibilities of the informant ;

whistleblower in terms of salary and incentives;

the reporter 's opportunities for education, training, or professional development;

whistleblower from using available information or other material resources at the organization's disposal;

the employee's other rights specified in the Collective Agreement; not to harm the whistleblower's working conditions.

## **Chapter 8. Categories of messages**

### 11. The messages consist of the following categories:

Misappropriation or embezzlement of property ; fraud by taking advantage of official position; forgery or forgery of documents;

abuse of office, deviation from the scope of official authority, inaction, cold-bloodedness ;

bribery or other unlawful acquisition of material or non-material benefits;  
monopoly , transparency and public procurement or public-private partnerships;  
interest and violation of the requirements of the Code of Ethics.

### **Chapter 9. Report on corruption, transparency and antitrust activities communication channels for giving**

12. The relevant message can be sent through the following communication channels:

Through the official website of the company (<https://www.ngmk.uz/>) ;

through their social media pages ([https://twitter.com/jsc\\_nmmc](https://twitter.com/jsc_nmmc),

<https://www.facebook.com/nkmkofficial>, <https://www.instagram.com/nkmk.official>,

<https://www.linkedin.com/company/isc-nmmc>, <https://www.youtube.com/nkmkofficial>) via

telegram-bot channel ([https://t.me/nkmk\\_contact\\_bot](https://t.me/nkmk_contact_bot)) ;

Through the company's hotline numbers (79-227-72-22, service phone numbers of Compliance Service employees posted on the official website);

Through the Company's email addresses ([info@ngmk.uz](mailto:info@ngmk.uz), [nkmk@exat.uz](mailto:nkmk@exat.uz), email addresses of Compliance Service employees posted on the official website);

By addressing the public orally , in writing, or electronically (in person);

By personally contacting the Compliance Officer;

law enforcement agencies;

through other communication channels not specified in these Regulations.

13. The Company posts information about communication channels on the Company's official website and social media pages and channels, as well as includes it in electronic newsletters and training materials sent periodically to employees, displays it on thematic posters placed in the Company's premises, etc.

### **Chapter 10. Receiving relevant messages arriving through communication channels**

14. the Department for Monitoring and Coordination of Applications from Individuals and Legal Entities are responsible for receiving and registering messages received through the Company's communication channels .

In this case, upon receipt of the relevant message, the responsible employee of the Company contacts the reporter via electronic correspondence or by telephone, clarifies the necessary information, registers the message, and enters the information into the Company's management.

15. The company's responsible employee analyzes incoming messages from Monday to Friday from 08:00 to 17:00. If applications are received outside of working hours or on weekends, these applications will be considered on the next working day .

If the reporter has additional materials to confirm his/her report, including photographs,

documents, audio and video recordings, the employee responsible for receiving the appeal will indicate the communication channels to be used for their submission. In this case, ensuring the confidentiality of the information provided is the responsibility of the employees who received and registered the appeal. The information received will be formalized as an appendix to the relevant appeal.

16. Relevant messages received from the following communication channels of the Company are registered in the manner prescribed by the internal departmental document of NKMK JSC based on the Model Regulation "On the Procedure for Working with Appeals from Individuals and Legal Entities in State Bodies, State Institutions and Organizations with State Participation", approved by Resolution of the Cabinet of Ministers No. 341 of May 7, 2018, and are forwarded to the responsible structure on the basis of an order (relationship mark) from the Company's management.

17. Relevant reports received through the Company's communication channels on violations of the law on corruption and conflict of interest, transparency and monopoly are reviewed by the Compliance Service.

regarding violations of the Code of Ethics will be reviewed by the Ethics Commission in an appropriate manner.

18. Whistleblowers have the opportunity to leave anonymous reports about corrupt practices, transparency, and monopoly that have been or may be committed .

19. In cases where an anonymous report of corrupt practices, transparency, and monopoly is received, the person responsible for receiving the report must, if possible, do the following:

Inform the reporter that they may not be able to contact the reporter to respond to the report received by the public ;

indicate that it may not be possible to fully and comprehensively study the message if additional necessary information is not available;

whistleblower to establish an anonymous communication channel to contact him (anonymous email address, secret chat on Telegram, etc.);

the complainant files a counter-application, the information in the application may be sent to the relevant authorities for verification and may be investigated without informing the complainant .

Anonymous reports may not be investigated under the law, but may serve to take appropriate measures to prevent the corruption risks identified in the report in the future.

20. reviewing reports received by public employees, the causes and circumstances of corruption offenses are also analyzed, and measures are taken to prevent them in the future and improve the system for combating corruption.

21. on the received reports (including decisions made and responses sent to the informants) must be stored in the Department of Control and Coordination of Cases

Concerning Appeals of Individuals and Legal Entities of the Company for the period established by the legislation of the Republic of Uzbekistan, but not less than 10 years.

22. the relevant report is received by the territorial (structural) divisions of the Company, the responsible employees who received it shall immediately notify in writing the head of the territorial (structural) division and the head of the Compliance Service of the received report, who, in turn, shall forward this report to the Compliance Service at the central office of the Company. The Compliance Service shall consider the received report in accordance with these Regulations .

23. Corruption and Conflict of Interest, Transparency and Monopoly, as well as violations of the requirements of the Code of Ethics is maintained by the Company's divisions, and the final report is summarized by the Compliance Service.

24. No employee of the Company may use his or her position to prevent other employees from exercising their rights or performing their duties.

### **Chapter 11. On corrupt practices, transparency and monopoly review messages**

25. All relevant reports received by the Compliance Service are reviewed by the responsible employees of this structure or other departments based on the instructions of the Head of the Company.

26. It is prohibited to involve employees in the process of reviewing reports on corruption, transparency and monopoly, whose actions have been the subject of a report or whose conflict of interest may arise during the review process.

27. Upon receipt of a relevant report, the Compliance Officer conducts a preliminary investigation and analyzes its relevance, that is, checks whether the information provided in the report contains any corruption-related violations and (or) conflicts of interest related to the Company's system.

The initial review will be carried out within 3 (three) business days from the date of receipt of the relevant notification by the Compliance Service.

28. Regardless of the results of the initial inspection in accordance with these Regulations, information about this will be entered into the Register.

29. If the Compliance Officer concludes that the report is not relevant, he or she will notify management within one business day to forward the report to the appropriate structure of the Company.

30. If the report contains information about corrupt practices, violations of the law on transparency, monopoly, and conflicts of interest, as well as sufficient grounds for conducting a service audit, the Compliance Officer will initiate a service audit in accordance with the procedure established by the internal departmental document.

31. The Company shall review the relevant reports within one month from the date of their receipt. In cases where it is necessary to conduct an investigation, request additional



materials, or take other measures, the terms for their review may be exceptionally extended by the head of the Company and his deputies for a maximum of one month, and the applicant (except for anonymous applications) shall be notified thereof.

32. reviewing relevant reports , if signs of an administrative offense or crime are identified, they will be sent to the relevant law enforcement agencies in accordance with the procedure established by law.

33. reviewing the relevant reports , a response letter indicating the results of the study and the applied corrective measures is prepared by the Compliance Service, signed by the Head of the Company, his deputies or the Head of the Compliance Service, and sent to the reporter in accordance with the established procedure.

34. Responses to relevant messages received through social media channels and pages, as well as through Telegram bots, can be sent to the sender electronically via social media channels and pages, or through Telegram bots.

### **Chapter 12. Accountability**

35. may be used by Compliance Service employees, employees of other relevant Companies involved in reviewing reports (only for such reports), the Company's Head, and the Anti-Corruption and Ethics Committee of the Supervisory Board .

36. Based on the register data, the Compliance Service submits a quarterly report on the receipt of reports of corruption-related activities to the Head of the Company and, if necessary, to the Supervisory Board and the Anti-Corruption Agency, which shall indicate the following:

received messages, including related messages and the number of related messages viewed;

the number of confirmed reports of corrupt practices, transparency, monopoly and conflict of interest;

review deadlines;

average time to review relevant messages;

whistleblowers and other statistical information.

### **Chapter 13. Final provisions**

37. Violation of the requirements of these Regulations shall entail liability in accordance with the established procedure .

38. These Regulations may be revised in the event of changes in the legislation of the Republic of Uzbekistan in the field of appeals and anti-corruption.

39. Any changes to these Regulations shall be approved by the Supervisory Board.

