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Lee Young Lok
Bank boshqaruvi raisi
Chairman of the Management Board

"TASDIQLANGAN"
Bank boshqaruvining
2025-yil 21-Apreldagi
IMB/LGD/HO/25/48 - sonli majlisi
bayonnomasiga muvofiq

KDB Bank Uzbekistan

PROCEDURE ON COMBATING BRIBERY AND CORRUPTION

PORAXO'RLIK VA KORRUPSIYAGA QARSHI KURASHISH TARTIBI

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III. ASSOCIATED INTERNAL POLICIES AND EXTERNAL REGULATIONS / TEGISHLI ICHKI QOIDALAR VA NORMATIV-HUQUQIY HUJJATLAR:

1. Criminal Code of the Republic of Uzbekistan / O'zbekiston Respublikasining Jinoyat kodeksi.
2. Law of the Republic of Uzbekistan "On Banks and Banking" (New edition) / O'zbekiston Respublikasining "Banklar va bank faoliyati to'g'risida"gi Qonuni (yangi tahriri).
3. Law of the Republic of Uzbekistan "On Combating Corruption" / O'zbekiston Respublikasining "Korrupsiyaga qarshi kurashish to'g'risida"gi Qonuni.
4. Law of the Republic of Uzbekistan "About appeals of individuals and legal entities" (New edition) / O'zbekiston Respublikasining "Jismoniy va yuridik shaxslarning murojaatlari to'g'risida"gi Qonuni (yangi tahriri).

6. Decree of the President of the Republic of Uzbekistan “On additional measures on improvement of the anti-corruption system in the Republic of Uzbekistan” #DP-6013 dd 29.06.2020 / O‘zbekiston Respublikasi Prezidentining 29.06.2020y. PF-6013-son “O‘zbekiston Respublikasida korrupsiyaga qarshi kurashish tizimini takomillashtirish bo‘yicha qo‘shimcha chora-tadbirlar to‘g‘risida”gi Farmoni.
7. Decree of the President of the Republic of Uzbekistan “On measures to create an atmosphere of intolerance towards corruption, to drastically reduce corruption factors in state and society management and to expand public participation in this process” #DP-6257 dd 06.07.2021 / O‘zbekiston Respublikasi Prezidentining 06.07.2021y. PF-6257-son “Korrupsiyaga qarshi murosasiz munosabatda bo‘lish muhitini yaratish, davlat va jamiyat boshqaruvida korrupsiyaviy omillarni keskin kamaytirish va bunda jamoatchilik ishtirokini kengaytirish chora-tadbirlari to‘g‘risida”gi Farmoni.
8. Resolution of the President of the Republic of Uzbekistan “On additional measures for effective organization of anti-corruption activities” #RP-5177 dd 06.07.2021 / O‘zbekiston Respublikasi Prezidentining 06.07.2021y. PQ-5177-son “Korrupsiyaga qarshi kurashish faoliyatini samarali tashkil etishga doir qo‘shimcha chora-tadbirlar to‘g‘risida”gi Qarori.
9. Standard regulation on the activities of internal anti-corruption control units (Approved by the order of the Director of the Anti-corruption agency of the Republic of Uzbekistan #27 dd 06.09.2021, registered by the Ministry of Justice on 08.09.2021 #3319) / Korrupsiyaga qarshi ichki nazorat tuzilmalari faoliyati to‘g‘risidagi Namunaviy nizom (Adliya vazirligi tomonidan 08.09.2021 yil 3319-son bilan ro‘yxatga olingan, O‘zbekiston Respublikasi Korrupsiyaga qarshi kurashish agentligi direktorining 06.09.2021y. 27-son buyrug‘I bilan tasdiqlangan).
10. Resolution of the Anti-Corruption Agency of the Republic of Uzbekistan, Ministry of Justice of the Republic of Uzbekistan “On approval of the methodology for identifying and assessing corruption risks in the activities of public authority and management bodies, including their territorial divisions, state unitary enterprises and institutions, organizations with state share more than 50 percent” #3383 dd 31.08.2022 / O‘zbekiston Respublikasi Korrupsiyaga qarshi kurashish agentligi, O‘zbekiston Respublikasi Adliya vazirligining 31.08.2022y. 3383-son “Davlat hokimiyati va boshqaruvi organlari, shu jumladan ularning hududiy bo‘linmalari, davlat unitar korxonalari va muassasalari, davlat ulushi 50 foizdan yuqori tashkilotlar faoliyatida korrupsiyaviy xavf-xatarlarni aniqlash va baholash uslubiyotini tasdiqlash to‘g‘risida” gi Qarori.

IV. REVISION HISTORY OF DOCUMENT VERSION / HUJJAT TAHRIRI TARIXI

Version / Tahrir	**Preparation date / Tayyorlangan sana**	**Summary of Key changes / Asosiy o‘zgartirishlar**
COMPD/3.0.-2021	27.12.2021	New Procedure

COMPD/3.1.-2025	21.04.2025	The ABC Part of Compliance Department merged with Sanctions Part

CONTENTS / MUNDARIJA

1. General provisions	**1. Umumiy qoidalar**
1.1. The Procedure on Combating Bribery and Corruption (hereinafter referred to as "Procedure") is based on the Anti-Corruption Policy of the JSC "KDB Bank Uzbekistan" (hereinafter referred to as "Bank").	1.1. Poraxo'rlik va korrupsiyaga qarshi kurashish Tartibi (keyingi o'rinlarda - "Tartib") "KDB Bank O'zbekiston" AJning (keyingi o'rinlarda - "Bank") Korrupsiyaga qarshi kurashish siyosatiga asoslanadi.
1.2. Current procedure defines the various controls designed to prevent, detect and investigate any suspicions of bribery and corruption within Bank, and ensure that the Bank and its subsidiaries comply with all relevant legal and regulatory requirements in these areas.	1.2. Ushbu tartib Bank doirasida har qanday poraxo'rlik va korrupsiya alomatlariga ega holatlarni oldini olish, aniqlash va tekshirishga qaratilgan turli xil nazorat choralarini belgilaydi hamda Bank va uning tarkibiy tuzilmalari tomonidan mazkur sohadagi barcha tegishli huquqiy va tartibga soluvchi talablarga rioya qilinishini ta'minlaydi.
1.3. The procedure is drawn up in accordance with the Law of the Republic of Uzbekistan "On Combating Corruption", Law of the Republic of Uzbekistan "On Banks and Banking Activity", "Standard for combating corruption in the activities of commercial banks", developed by Uzbekistan Banking Association, International standard on anti-bribery management systems "ISO 37001:2016", developed by International Organization for Standardization, Charter of the Bank and other internal documents of the Bank.	1.3. Mazkur tartib "Korrupsiyaga qarshi kurashish to'g'risida"gi, "Banklar va bank faoliyati to'g'risida"gi O'zbekiston Respublikasi Qonunlariga, O'zbekiston banklari assotsiatsiyasi tomonidan ishlab chiqilgan "Tijorat banklari faoliyatidagi korrupsiyaga qarshi kurashish standarti"ga, Xalqaro standartlashtirish tashkiloti tomonidan ishlab chiqilgan poraxo'rlikka qarshi boshqaruv tizimlari bo'yicha "ISO 37001:2016" xalqaro standartiga, Bank Ustavi va boshqa ichki qoidalari asosida ishlab chiqilgan.
1.4. This procedure is an integral part of all of the Bank's internal regulations including, but not limited to: • Policy for the prevention and management of Conflicts of Interest; • Human resources and Code of Conduct policy; • Regulation on Compliance Committee; • Regulation on Commission for Prevention of Corruption.	1.4. Joriy tartib Bankning quyidagi barcha ichki qoidalarining ajralmas qismi hisoblanadi va bular bilan cheklanmaydi: • Manfaatlar to'qnashuvining oldini olish va bartaraf etish siyosati; • Xodimlar bilan ishlash va odob-axloq siyosati; • Komplayens qo'mitasi to'g'risidagi Nizom; • Korrupsiyaning oldini olish bo'yicha komissiya to'g'risidagi Nizom.
2. Main terms	**2. Asosiy tushunchalar**
In this procedure the following basic concepts are applied: **Bribery** - receiving, giving a bribe or mediation in these crimes;	Ushbu tartibda quyidagi asosiy tushunchalardan foydalaniladi:

Corruption - illegal use by a person of official or duty position with the aim of obtaining tangible or intangible benefits in personal interests or in the interests of other persons, and an unlawful provision of such benefit; **Corruption offense** - an act possessing signs of corruption, for fulfillment of which the legislation provides for liability; **Corruption risk** - the possibility of committing illegal actions of a corrupt nature by Bank employees or third parties; **Conflict of interests** - a situation, in which personal interest (direct or indirect) affects or can affect the proper performance by a person of official obligations or duties and in which arises or may arise a contradiction between personal interest and the rights and legitimate interests of citizens, organizations, society or the state; **Due diligence** - process to further assess the nature and extent of the bribery risk and help organizations make decisions in relation to specific transactions, projects, activities, business associates and personnel; **Public official** - person who is appointed or elected permanently, temporarily or by special authority, who performs the functions of a representative of the authorities or performs organizational and administrative, administrative and economic functions in state bodies, citizens' self-government bodies, at enterprises, institutions, organizations, regardless of the form of ownership and authorized to perform legally significant actions, as well as a person performing these functions in an international organization or in a legislative, executive, administrative or judicial body of a foreign state; **SACC Part** – Sanctions and Anti-Corruption Compliance Part of the Compliance Department.	**Poraxo‘rlik** - pora olish, pora berish yoki bu jinoyatlarda vositachilik qilish; **Korrupsiya** - shaxsning o‘z mansab yoki xizmat mavqeyidan shaxsiy manfaatlarini yoxud o‘zga shaxslarning manfaatlarini ko‘zlab moddiy yoki nomoddiy naf olish maqsadida qonunga xilof ravishda foydalanishi, xuddi shuningdek bunday nafni qonunga xilof ravishda taqdim etish; **Korrupsiyaga oid huquqbuzarlik** - korrupsiya alomatlariga ega bo‘lgan, sodir etilganligi uchun qonunchilikda javobgarlik nazarda tutilgan qilmish; **Korrupsiya xavf-xatari** - bank xodimlari yoki uchinchi shaxslar tomonidan korrupsion xarakterdagi noqonuniy harakatlarni sodir etish imkoniyati; **Manfaatlar to‘qnashuvi** - shaxsiy (bevosita yoki bilvosita) manfaatdorlik shaxsning mansab yoki xizmat majburiyatlarini lozim darajada bajarishiga ta’sir ko‘rsatayotgan yoxud ta’sir ko‘rsatishi mumkin bo‘lgan hamda shaxsiy manfaatdorlik bilan fuqarolarning, tashkilotlarning, jamiyatning yoki davlatning huquqlari va qonuniy manfaatlari o‘rtasida qarama-qarshilik yuzaga kelayotgan yoki yuzaga kelishi mumkin bo‘lgan vaziyat; **Lozim darajada tekshirish** - poraxo‘rlik xavf-xatari mohiyati va qamrovini keyinchalik baholash hamda o‘ziga xos operatsiyalar, loyihalar, faoliyat turlari, biznes hamkorlar va xodimlarga nisbatan qarorlar qabul qilishda tashkilotlarga yordam ko‘rsatish jarayoni; **Mansabdor shaxs** - doimiy, vaqtincha yoki maxsus vakolat bo‘yicha tayinlanadigan yoki saylanadigan, hokimiyat vakili vazifalarini bajaradigan yoxud davlat organlarida, fuqarolarning o‘zini o‘zi boshqarish organlarida, mulk shaklidan qat’i nazar, korxonalarda, muassasalarda, tashkilotlarda tashkiliy-boshqaruv, ma’muriy-xo‘jalik vazifalarini amalga oshiradigan va yuridik ahamiyatga ega harakatlarni sodir etishga vakolat berilgan shaxs, xuddi shuningdek xalqaro tashkilotda yoxud chet davlatning qonun chiqaruvchi, ijro etuvchi, ma’muriy yoki sud organida

ABC officer – an employee of SACC Part who is in charge for Anti-Corruption Compliance activities. **ABC** – Anti-Bribery and Corruption. **3. Scope and Purpose** This procedure applies to all customers, counterparties, management, employees, all Bank activities and operations, its subsidiaries and is intended to govern the day-to-day activities of JSC "KDB Bank Uzbekistan" personnel. The purpose of this procedure is to set out the responsibilities of the Bank's management and employees in dealing with anti-bribery and corruption issues and to avoid the occurrence of improper and illegal conduct. **4. Goals, tasks and functions of SACC Part related to ABC activities** 4.1. The main goals are: • implementation and development of anti-corruption complex system, that meets the requirements of international standard "ISO 37001:2016"; • early detection of bribery and corruption cases and elimination of their causes and conditions; • prevention of the occurrence of corrupt practices; • to increase legal awareness and culture of the Bank employees in order to form intolerant attitude towards corruption; • organization of preventive measures to combat bribery and corruption; • ensuring compliance with anti-corruption documents. 4.2. The following are the main tasks: • improvement of the Bank's anti-corruption activities;	mazkur vazifalarni amalga oshiruvchi shaxs; **SACC bo'linmasi** – Komplayens boshqarmasining Sanksiyaviy komplayens va Korrupsiyaga qarshi kurashish bo'linmasi. **ABC xodimi** - Sanksiyaviy komplayens va Korrupsiyaga qarshi kurashish bo'linmasining Poraxo'rlik va korrupsiyaga qarshi kurashish faoliyati uchun mas'ul xodimi. **ABC** – Poraxo'rlik va korrupsiyaga qarshi kurashish. **3. Qo'llanish doirasi** Ushbu tartib barcha mijozlar, kontragentlar, rahbariyat, xodimlar, Bankning barcha faoliyat turlari va operatsiyalari, Bankning tarkibiy tuzilmalariga tatbiq qilinadi va "KDB Bank O'zbekiston" AJ xodimlarining har kunlik faoliyatini boshqarish uchun mo'ljallangan. Mazkur tartibdan ko'zlangan maqsad Bank rahbariyati va xodimlarining poraxo'rlik va korrupsiyaga qarshi kurash masalalari bilan shug'ullanishdagi mas'uliyatlarini belgilash hamda noto'g'ri va noqonuniy xatti-harakatlar sodir etilishining oldini olishdan iborat. **4. SACC bo'linmasining ABC faoliyatiga doir maqsad, vazifa va funksiyalari** 4.1. Asosiy maqsadlar quyidagilardan iborat: • korrupsiyaga qarshi kurash bo'yicha "ISO 37001:2016" xalqaro standarti talablariga mos ravishda korrupsiyaga qarshi kurashish tizimini joriy etish va rivojlantirish; • korrupsiyaviy holatlarni barvaqt aniqlash va ularning sabab hamda shart-sharoitlarini bartaraf etish; • korrupsiyaviy xatti-harakatlar sodir etilishining oldini olish; • Bank tizimi xodimlarida korrupsiyaga nisbatan murosasiz munosabatni

• prevention and combating corruption offenses in the Bank; • monitoring the effective functioning of the Bank’s anti-corruption system; • cooperation with other state bodies and organizations carrying out and participating in anti-corruption activities.	shakllantirish maqsadida ularning huquqiy ongi va madaniyatini oshirish; • korrupsiyaga qarshi profilaktik chora-tadbirlarni tashkil etish; • korrupsiyaga qarshi kurashish sohasidagi hujjatlar ijrosini ta’minlashdan iborat.
	4.2. Asosiy vazifalar quyidagilardan iborat:
4.3. The main functions:	• Bankning korrupsiyaga qarshi kurashish bo‘yicha faoliyatini takomillashtirish; • Bankda korrupsiyaga oid huquqbuzarliklarni profilaktika qilish va ularga qarshi kurashish; • Bankda korrupsiyaga qarshi kurashish tizimining samarali ishlashini ta’minlash va nazorat qilish; • korrupsiyaga qarshi kurashish bo‘yicha faoliyatni amalga oshiruvchi hamda unda ishtirok etuvchi boshqa davlat organlari va tashkilotlari bilan hamkorlikni olib borish.
• develops drafts of internal documents aimed at implementing measures to combat bribery and corruption; • assesses corruption and bribery risks; • analyzes complaints received through special communication channels on corruption risks and violations and ensures their consideration in accordance with the established procedure; • provides explanations and recommendations to the Bank’s employees on anti-corruption issues; • analyzes the information on the results of the official inspections conducted on the facts of corruption in order to further improve the Bank’s anti-corruption system; • participates in the development of the training program to improve the qualifications of Bank’s employees in terms of anti-corruption standards; • controls the conduct of anti-bribery/corruption trainings for all Bank employees and their participation in them in accordance with training program; • monitors and controls compliance by employees with the current legislation of the Republic of Uzbekistan and internal documents and procedures on anti-bribery and corruption matters for preventing and combating bribery and corruption; • conducts inspections of the Bank’s activities for compliance with its internal anti-bribery and corruption documents	4.3. Asosiy funksiyalar quyidagilarni o‘z ichiga oladi: • korrupsiyaga qarshi kurashish bo‘yicha chora-tadbirlarni amalga oshirishga qaratilgan ichki qoidalar loyihalarini ishlab chiqadi; • korrupsiyaviy va poraxo‘rlik xavf-xatarlarini baholaydi; • maxsus axborot aloqa kanallari orqali korrupsiyaviy xavf-xatarlar va huquqbuzarliklar haqida kelib tushadigan murojaatlarni tahlil qiladi hamda ularni belgilangan tartibda ko‘rib chiqilishini ta’minlaydi; • Bank xodimlariga korrupsiyaga qarshi kurashish masalalari bo‘yicha tushuntirish va tavsiyalar beradi; • korrupsiyaga qarshi kurashish tizimini yanada takomillashtirish maqsadida Bankda korrupsiya faktlari yuzasidan o‘tkazilgan xizmat tekshiruvlari natijalari haqidagi ma’lumotlarni tahlil qiladi; • Bank xodimlarining malakasini oshirish bo‘yicha o‘quv rejalarining

and procedures and international standards; • cooperates with law enforcement authorities in the implementation of measure to eradicate corruption or investigate corruption crimes; • performs other functions in accordance with legislative acts.	korrupsiyaga qarshi standartlarga doir qismini ishlab chiqishda ishtirok etadi; • o'quv rejaga muvofiq, Bankning barcha xodimlari uchun korrupsiyaga qarshi kurashish bo'yicha treninglarning o'tkazilishini hamda ularda xodimlarning ishtirok etishini nazorat qiladi; • Bank tizimidagi xodimlar tomonidan korrupsiyaga qarshi kurashish sohasidagi O'zbekiston Respublikasining amaldagi qonunchiligiga va korrupsiyani oldini olish hamda unga qarshi kurashish bo'yicha ichki qoidalariga rioya qilinishini monitoring va nazorat qiladi; • Bank faoliyatining Bankni korrupsiyaga qarshi kurashish bo'yicha ichki qoidalariga hamda xalqaro standartlarga muvofiqligi yuzasidan tekshiruvlar o'tkazadi; • korrupsiyaviy xatti-harakatlarni bartaraf qilish yoki korrupsiyaviy jinoyatlarni tergov qilish bo'yicha tadbirlarni amalga oshirishda huquqni muhofaza qiluvchi organlar bilan hamkorlik qiladi; • amaldagi qonun hujjatlariga muvofiq boshqa funksiyalar ham amalga oshiriladi.
5. Duties and Responsibilities 5.1. <u>Bank's Management at all levels</u>: • Is responsible for involvement in key decision-making and has the overall responsibility for the design and implementation of an anti-bribery and anti-corruption framework; • Sets "the tone from the top": creates an internal culture that is aware and responsive to the risks of anti-bribery and corruption; • Ensure that appropriate action is taken with respect to complaints, allegations and warnings; • Treat all complaints and reports confidentially.	**5. Burch va mas'uliyat** 5.1. <u>Barcha darajadagi Bank rahbariyati</u>: • Muhim qarorlarni qabul qilishda ishtirok etishga mas'uldir va poraxo'rlik hamda korrupsiyaga qarshi tizimni ishlab chiqish va amalga oshirish uchun umumiy ravishda javobgar sanaladi; • "Yuqoridan ohang" tizimini o'rnatadi: poraxo'rlik va korrupsiyaviy xavf-xatarlardan xabardor bo'lishga va reaksiya qilishga qaratilgan ichki madaniyatni shakllantiradi; • Shikoyatlar, arizalar va ogohlantirishlarga javoban tegishli choralar ko'rilishini ta'minlaydi; • Har bir shikoyat va hisobotlarni maxfiy ravishda o'rganib chiqadi.
5.2. <u>Compliance Committee</u> Carries on tasks and functions set out in Regulation on Compliance Committee. 5.3. <u>Commission for prevention of corruption in the Bank</u> Carries on tasks and functions set out in Regulation on Commission for Prevention of Corruption. 5.4. <u>Head of Compliance Department:</u> • Oversees the effective functioning of key components of Compliance Function; • Periodically reviews reports of Head of SACC Part on anti-bribery and corruption potential problems/issues;	

• Monitors the efficiency, sufficiency and compliance of ABC activities; • Advice and support on risk and control issues in handling anti-bribery and corruption matters. 5.5. Head of SACC Part shall: • Leading the ABC area, ensuring compliance with anti-corruption standards and regulations; • Develop and implement internal ABC processes, including monitoring and reporting; • Coordination with the ABC officer to ensure the timely execution of tasks and reporting; • Reporting to the Head of the Compliance Department on the ABC performance and the results of audits or inspections. Head of SACC Part is entitled to: ✓ receive analytical materials, conclusions, statistical data and other information from the Bank employees on issues within their competence; ✓ issue written instructions, orders and recommendations within the framework of the Bank’s activities; ✓ conducting inspections, requesting documents, receiving written explanations from employees. 5.6. ABC officer shall: • Be responsible for antibribery and corruption risk assessments;	5.2. Komplayens qo‘mitasi: Komplayens qo‘mitasi to‘g‘risidagi Nizomda belgilangan vazifalar va funksiyalarni amalga oshiradi. 5.3. Bankda korrupsiyaning oldini olish komissiyasi Korrupsiyaning oldini olish komissiyasi to‘g‘risidagi Nizomda belgilangan vazifalar va funksiyalarni amalga oshiradi. 5.4. Komplayens boshqarmasining boshlig‘i: • Komplayens funksiyasining asosiy tarkibiy qismlarining samarali ishlashini nazorat qilish; • SACC bo‘linmasi boshlig‘ining poraxo‘rlik va korrupsiyaga qarshi potensial muammolar to‘g‘risidagi hisobotlarini vaqti-vaqti bilan ko‘rib chiqish; • ABC ga doir faoliyatining samaradorligi, etarliligi va muvofiqligini nazorat qilish; • poraxo‘rlik va korrupsiyaga qarshi kurashishda tavakkalchilik hamda nazorat masalalari yuzasidan maslahat berish va qo‘llab-quvvatlash. 5.5. SACC bo‘linmasi boshlig‘i: • Poraxo‘rlik va korrupsiyaga qarshi kurashish sohasiga rahbarlik qilish, korrupsiyaga qarshi kurashish standartlari va qoidalariga rioya qilish etilishini ta’minlash; • Poraxo’rlik va korrupsiyaga qarshi kurashish ichki tartibini, shu jumladan monitoring va hisobot berish tartiblarini ishlab chiqarish va joriy etish; • Vazifalar ca hisobotlarni o‘z vaqtida bajarilishini taminlash uchun poraxo‘rlik va korrupsiyaga qarshi kurashish masul xodimi bilan vazifalarni muvofilashtirish;

• Report to management weaknesses identified in business processes that may allow bribery and corruption to take place; • Conduct investigation of any reported, suspected or actual cases of acts of bribery and corruption, involving Commission for prevention of corruption and Compliance Committee in aggravated cases; • Be responsible for training and informing staff members on anti-bribery and corruption matters; • Maintain an independent hot line indicated on Bank's official website; • Make proposals for improving Bank processes in order to reduce bribery and corruption risks; • Maintaining records and ensuring adherence to anti-corruption standards; • Liaising with other departments to identify and mitigate corruption risks. ABC officer is entitled to: ✓ request and receive the necessary assistance from the Bank employees in the framework of their duties performance; ✓ conduct internal inspections on corruption offenses identified in the activities of the Bank employees; ✓ participation in anti-bribery/corruption meetings of the Bank. 5.7. <u>All Bank Employees shall</u>: • Be responsible for the prevention and detection of possible bribery and corruption; • Be responsible for effective management of anti-bribery and corruption risks related to their fields of activity;	• Poraxo'rlik <u>va korrupsiyaga qarshi kurashish ishlar yuzasidan audity yoki tekshiruv natijalari bo'yicha Komplayens boshqarmasi boshlig'iga hisobot berish.</u> SACC bo'linmasi boshlig'i quyidagi huquqlarga ega: ✓ o'z vakolatiga kiradigan masalalar bo'yicha Bank xodimlaridan tahliliy materiallar, xulosalar, statistik ma'lumotlar va boshqa axborotlarni olish; ✓ Bank faoliyati doirasida yozma ko'rsatmalar, buyruqlar va tavsiyalar beradi; ✓ tekshirishlar o'tkazish, hujjatlarni so'rab olish, xodimlardan yozma tushuntirishlar olish 5.6. ABC xodimi: • Poraxo'rlik va korrupsiyaviy xavf-xatarni baholash uchun javobgar hisoblanadi; • Poraxo'rlik va korrupsiyaga yo'l qo'yishi mumkin bo'lgan biznes jarayonlarda aniqlangan zaif nuqtalar haqida rahbariyatga xabar beradi; • Og'irlashtiruvchi holatlarda Korrupsiyaning oldini olish komissiyasi va Komplayens qo'mitasini jalb qilgan holda, poraxo'rlik va korrupsiya harakatlarining har qanday xabar qilingan, gumon qilingan yoki sodir etilgan holatlarini tekshiradi; • Xodimlarni poraxo'rlik va korrupsiyaga qarshi kurashish yuzasidan o'qitish va xabardor qilish uchun mas'ul sanaladi; • Bankning rasmiy veb-saytida ko'rsatilgan mustaqil ishonch telefoning ishlab turishini ta'minlaydi; • Korrupsiyaviy xavf-xatarni kamaytirish maqsadida Bank jarayonlarini yaxshilash bo'yicha takliflar kiritadi.

- Report to Head of SACC Part any cases of actual, potential, suspected or attempted acts of bribery and corruption they become aware of, whether the act of bribery and corruption is offered, given or received. Also assist in investigations and comply with the relevant controls;
- Complete trainings and assessments when they are required to do so by the Chairman of the Board or Line Manager.

6. Main risk areas for acts of bribery and corruption

6.1. Gifts and representative costs
In order to avoid the risk of being perceived as bribing or being bribed by accepting gifts from or giving gifts to customers and suppliers, Bank employees should strictly follow the "Human Resources and Code of Conduct Policy" of the Bank on matters related to gifts and representative costs.

6.2. Charity, sponsorship, donations
6.2.1. In no case charitable contribution, sponsorship or donation can be used as a subterfuge for bribery and corruption.
6.2.2. The Bank does not offer charitable support and sponsorships in order to gain preferential treatment and commercial advantages.

6.3. Payments via intermediaries or on behalf of third parties
The Bank and its employees are prohibited to make any corrupt payments through any subsidiaries, agents, intermediaries, business partners, contractors or suppliers (individuals or organizations) of Bank or to make any payment to a third party where there is any reason to believe that all or a portion of the payment will go towards a bribe and corruption.

- Korrupsiyaga qarshi kurashish standartlariga rioya etilishini ta'minlash va hisobotini yuritish;
- Korrupsiya xavfini aniqlash va kamaytirish uchun boshqa idoralar bilan aloqa oʻrnatish.

ABC xodimining huquqlari:

- ✓ bank xodimlaridan oʻz vazifalarini bajarishi doirasida zarur koʻmakni soʻrash va olish;
- ✓ bank xodimlari faoliyatida aniqlangan korrupsiyaviy huquqbuzarliklar boʻyicha xizmat tekshiruvlari oʻtkazish;
- ✓ Bankning poraxoʻrlik/korrupsiyaga qarshi kurash masalalariga bagʻishlangan yigʻilishlarida ishtirok etish.

5.7. Bankning barcha xodimlari:
- Roʻy berishi mumkin boʻlgan poraxoʻrlik va korrupsiya holatlarining oldini olish va aniqlash uchun mas'ul sanaladilar;
- Oʻz faoliyat sohalari bilan bogʻliq poraxoʻrlik va korrupsiyaviy xavf-xatarlariga qarshi kurashni samarali boshqarish uchun mas'ul hisoblanadilar;
- SACC boʻlinmasiboshligʻiga oʻzlari xabar topgan, xabar beruvchi xodim tomonidan yoki unga nisbatan sodir etilgan poraxoʻrlik va korrupsiya holatlari toʻgʻrisida aniq, potensial, gumon qilinayotgan yoki urinish sodir boʻlganligi holatlari yuzasidan xabar berishlari lozim. Shuningdek, tekshiruvlarda yordam berishlari va tegishli nazorat tadbirlariga rioya qilishlari zarur;
- Boshqaruv raisi yoki tarmoq menejeri tomonidan talab qilinganda, treninglar va baholashlarni yakunlashlari lozim.

6. Poraxoʻrlik va korrupsiyaviy harakatlarning sodir etilishi xavf-xatarini keltirib chiqaruvchi asosiy omillar

6.4. Facilitation payments Facilitation payments are small bribes to Bank officials with a view to speeding up routine banking facilities to which the entity is already entitled. The Bank does not tolerate its employees or third parties in their relationship with the Bank, offering, promising, soliciting, demanding, giving or accepting any kind of facilitation payments to or from any third party. Any case of Facilitation payments must be reported to Head of SACC Part immediately.	6.1. Sovg‘alar va vakillik xarajatlari Mijozlar va ta’minotchilardan sovg‘alar olish yoki ularga sovg‘alar berish vositasida poraxo‘rga aylanib qolish holatlarining oldini olish uchun, Bank xodimlari sovg‘alar va vakillik xarajatlari bilan bog‘liq masalalar yuzasidan Bankning “Xodimlar bilan ishlash va odob-axloq siyosati”ga qat’iy rioya qilishlari lozim. 6.2. Xayriya, homiylik va hadya 6.2.1. Hech bir holatda xayriya, homiylik mablag‘lari yoki hadyadan poraxo‘rlik va korrupsiyaviy omil sifatida foydalanish mumkin emas. 6.2.2. Bank imtiyozli munosabat hamda tijorat afzalliklariga erishish uchun xayriya va homiylikni taklif qilmaydi.
6.5. Dealing with public officials Dealing with public officials poses a particularly high risk in relation to bribery and corruption. The provision of money or anything else of value, no matter how small, to any public official for the purpose of influencing them in their official capacity is prohibited. The Bank retrains from paying any expenses for public servants and their close relatives (or in their interests) in order to obtain commercial advantages in specific projects of the Bank and its branches, including expenses for transportation, accomodation, food, entertainment, PR campaigns, or their receipt at the expense of the Bank. 6.6. Involvement in political activities The Bank does not make contributions to political parties, organizations and movements in order to obtain commercial advantages in specific projects of the Bank and its branches. 6.7. Conflict of interest The Bank employees must avoid situations when their personal interest could conflict with their professional obligations or duties or contradict the Bank's clients’ interests. If the Bank employees are aware of any circumstances which they think may give	6.3. Vositachilar orqali yoxud uchinchi shaxslar manfaatlarini ko‘zlab amalga oshiriladigan to‘lovlar Bank va uning xodimlariga har qanday sho‘ba korxonalar, agentlar, vositachilar, biznes hamkorlar, shartnomalar bo‘yicha hamkorlar yoki ta’minotchilar (jismoniy shaxslar yoxud tashkilotlar) orqali har qanday korrupsiyaviy to‘lovlarni amalga oshirish yoki to‘lovning hammasi yoki bir qismi pora va korrupsiyaviy holatni vujudga keltirishiga ishongan holda uchinchi shaxs nomiga har qanday to‘lovni amalga oshirish taqiqlanadi. 6.4. Biron-bir masalaning hal qilinishini osonlashtirishga qaratilgan to‘lovlar Bunday to‘lovlar Bank mansabdor shaxslariga Bank xizmatlarini ko‘rsatishga doir biron-bir kundalik jarayonni tezlashtirish maqsadida, holbuki mazkur mansabdor shaxslar shundoq ham qayd etilgan masalalarni hal etish vakolatiga ega bo‘lgan vaziyatda beriladigan kichik pora hisoblanadi. Bank o‘z xodimlarining yoki uchinchi shaxslarning Bank bilan munosabatlarida, shu jumladan uchinchi shaxsga yoki uchinchi shaxs tomonidan bunday to‘lovlarni taklif qilish, va’da berish, so‘rash hamda talab qilib olish holatlariga yo‘l qo‘yilishiga qarshidir.

rise to a conflict of any kind, or if they become aware of information which places them in difficulty in carrying out their function they must handle as per the "Policy for the prevention and management of Conflicts of Interest" which all Employees shall strictly follow. 6.8. <u>Employment related risks</u> Bank's prohibition against bribery and corruption includes that the Bank's employee must not offer or provide employment opportunities, whether paid or unpaid, permanent or temporary, as an inducement to anyone to act improperly to obtain or retain an advantage in business. No offers of employment may be made to any Bank customer or business partner or to any civil servant or government official who might be associated with the Bank's business or operations except through the Bank's normal and competitively-based recruitment and hiring processes. Due diligence into the bribery risk associated with employing a person must be completed prior to prospective employees commencing employment, including graduate or vocational placements in accordance with the "Human resources and Code of Conduct policy". 6.9. <u>"Red flag" situations</u> "Red flag" - a circumstance or fact that acts as a warning signal and suggests an increased risk of bribery and corruption. The Bank employees should be aware of "Red flags" and, where they are seen, should be alert to the potentially increased anti-bribery/anti-corruption risks. Any transaction that appears questionable and/or has no obvious rationale or explanation should be considered as a potential "Red flag" and must be reported to Head of SACC Part for further investigation and advice.	Yugorida qayd etilgan to'lovlarga aloqador har qanday holat yuzasidan darhol SACC bo'linmasi boshlig'iga xabar berilishi lozim. 6.5. <u>Mansabdor shaxslar bilan munosabatlar</u> Mansabdor shaxslar bilan munosabatlarga kirishish yuqori darajadagi poraxo'rlik va korrupsiyaviy xavf-xatarni tug'diradi. Har qanday mansabdor shaxsga o'z lavozimiga ta'sir o'tkazish maqsadida pul yoki boshqa biron-bir qimmatbaho narsa taqdim qilish, uning hajmidan qat'i nazar taqiqlanadi. Bank yoki uning filiallarining alohida loyihalarida tijorat afzalliklariga erishishi maqsadida Bank davlat xizmatchilari va ularning yaqin qarindoshlari uchun (yoki ularning manfaatlarini ko'zlab) har qanday xarajatlarni amalga oshirilishiga, shu jumladan transport, turar-joy, ovqatlanish, ko'ngil ochish, piar kampaniyalarni Bank hisobidan qoplab berilishiga yo'l qo'ymaydi. 6.6. <u>Siyosiy faoliyatga jalb qilish</u> Bank va uning filiallarining alohida loyihalarida tijorat afzalliklariga erishishi maqsadida Bank siyosiy partiyalar, tashkilotlar va harakatlarga o'z hissasini qo'shmaydi. 6.7. <u>Manfaatlar to'qnashuvi</u> Bank xodimlari o'z shaxsiy manfaatlarining lavozim majburiyatlari bilan to'qnashuviga yoki Bank mijozlarining manfaatlariga zid bo'lishiga yo'l qo'ymasliklari lozim. Agar Bank xodimlari ularning fikricha har qanday turdagi mojaroni keltirib chiqarishi mumkin bo'lgan har qanday holatlardan yoxud o'z vazifalarini bajarishda qiyinchiliklarga sabab bo'lishi mumkin bo'lgan ma'lumotlardan xabardor bo'lsalar, ular barcha xodimlar qat'iy rioya qilishi lozim bo'lgan "Manfaatlar to'qnashuvining oldini olish va bartaraf etish siyosati"ga amal qilishlari kerak.

Further examples of "Red flags" are set out below: ✓ not following the Bank's policies and procedures; ✓ an unusually generous gift or lavish hospitality are offered by a third party; ✓ payments made through third party countries or to offshore accounts; ✓ request for non-standard terms of the contract; ✓ payments made without compliance with internal controls; ✓ use of significant amounts of cash; ✓ book-keeping that is not transparent or is not supported by relevant documents. This list is not exhaustive and all employees should be alert to other indicators that may raise a suspicion of bribery and corrupt activity.	6.8. <u>Ish faoliyatini olib borish bilan bog'liq xavf-xatarlar</u> Bankda poraxo'rlik va korrupsiyaviy xatti-harakatlarni sodir etishning taqiqlanishi Bank xodimi tomonidan ishga qabul qilish bilan bog'liq qulayliklar biron-bir shaxsga taklif yoxud taqdim etilishi mumkin emasligini anglatadi. Bunday taklif yoki taqdim qilish qandaydir to'lov evaziga yoki hech qanday to'lovsiz, doimiy yoxud vaqtinchalik muddatga har qanday shaxsni nomaqbul harakat sodir etishga jalb qilish yoxud biznes manfaatlarni qo'lga kiritish yoki saqlab qolishga qaratilgan bo'lishi mumkin. Bankning ish faoliyati yoki operatsiyalariga aloqador bo'lgan har qanday mijozga, biznes hamkorga yoki mansabdor shaxslarga Bankka ishga qabul qilish taklif etilishiga yo'l qo'yilmaydi. Bank tomonidan odatdagi o'rnatilgan tartibda hamda sog'lom raqobatga asoslangan ishga qabul qilish jarayonlari bundan mustasno. Shaxsni ishga qabul qilishda poraxo'rlik xavf-xataridan lozim darajada tekshirish ishga qabul qilish yoki lavozimga tayinlashdan avval "Xodimlar bilan ishlash va odob-axloq siyosatiga" muvofiq amalga oshirilishi kerak.
7. Measures and defences to combat bribery and corruption 7.1. <u>Tone from the Top</u> The Top Management of the Bank sets the "Tone from the top": creates an internal corporate culture that is against all bribery and corruption practices, which includes the framework for implementation in regards to observing and upholding the Bank's zero tolerance position on corruption and bribery. 7.2. <u>Risk assessment</u> The Bank conducts an assessment of bribery and corruption risks on an annual basis. Risk assessment is carried out by the ABC officer in accordance with the requirements of the national legislation and international standards.	6.9. <u>"Qizil bayroq" holatlari</u> "Qizil bayroq" xavf-xatardan ogohlantirishga qaratilgan ishora sifatida sodir etiladigan harakat bo'lib, aniq bir holatni yoki poraxo'rlik va korrupsiyaviy xavf-xatarning ortganligini anglatadi. Bank xodimlari "Qizil bayroq"lardan ogoh bo'lishlari va bunday holatlarni payqagan taqdirda poraxo'rlik/korrupsiyaviy xavf-xatarlarning ortganligi to'g'risida SACC bo'linmasi boshlig'ini o'rnatilgan tartibda ogohlantirishlari kerak. Shubhali ko'ringan va/yoki ochiq-oydin izohi mavjud bo'lmagan har qanday tranzaksiya potensial "Qizil bayroq" sifatida qaralishi va bu haqda navbatdagi tekshiruv hamda maslahatlashuvni amalga oshirishi uchun SACC bo'linmasining boshlig'i xabardor qilinishi darkor.

7.2.1. The procedure for conducting an assessment of bribery and corruption risks is as follows:

- In accordance with Appendix No. 1 to this procedure, the Bank's activities are presented in the form of separate business processes, each of which identifies constituent elements (sub-processes);
- «Critical points» are determined - for each business process, those elements (sub-processes) are determined where corruption offenses are most likely to occur;
- To assess the corruption risk at a critical point, its quantitative (risk value in points) and qualitative (high/significant, medium, low/insignificant risk) expressions are applied;
- The level of corruption risk is assessed based on the criteria of the probability of its realization and the potential impact of its realization on the bank's activities;
- The degree of expression of the Risk Probability criteria is evaluated on a 3-point scale: high - 3 points, medium - 2 points, low - 1 point (Appendix No. 2);
- The process of calculating the average value of the corruption risk probability and its correlation with intervals includes:
  - ✓ summarizing the assessments of all criteria;
  - ✓ calculating the average probability value by dividing the obtained total sum of assessments of all criteria by the number of criteria

(Average probability value = Sum of assessments of all criteria / number of criteria)

- ✓ Correlating the obtained average value with probability intervals:

Probability	Points	Range
Low	1	1.0 - 1.49
Medium	2	1.5 - 2.49
High	3	2.5 - 3.0

“Qizil bayroqlar”ga navbatdagi misollar quyidagilardan iborat:

- ✓ Bank siyosati va ichki qoidalariga rioya qilmaslik;
- ✓ uchinchi shaxs tomonidan noodatiy qimmatbaho sovg‘a yoki hashamatli mehmondo‘stlikning taklif etilishi;
- ✓ uchinchi shaxs sanalgan mamlakatlar orqali yoxud ofshor hisobvaraqlar nomiga to‘lovlar amalga oshirilishi;
- ✓ shartnomaga nostandart shartlarni kiritishning so‘ralishi;
- ✓ ichki nazorat qoidalariga rioya qilinmagan holda to‘lovlarning amalga oshirilishi;
- ✓ katta miqdordagi naqd pul mablag‘laridan foydalanish;
- ✓ shaffof bo‘lmagan yoxud tegishli hujjatlar bilan tasdiqlanmagan buxgalteriyaning yuritilishi.

Yuqorida keltirilgan ro‘yxat to‘liq emas bo‘lib, barcha xodimlar poraxo‘rlik va korrupsiyaviy faoliyatga yuz berayotganligiga shubha tug‘dirishi mumkin bo‘lgan boshqa alomatlardan ham ogoh bo‘lishlari zarur.

7. Poraxo‘rlik va korrupsiyaga qarshi kurashish choralari va himoya vositalari

7.1. Yuqoridan ohang

Bankning yuqori rahbariyati “Yuqoridan ohang”ni o‘rnatgan holda, har qanday poraxo‘rlik va korrupsiyaga nisbatan murosasiz bo‘lgan ichki korporativ madaniyatni shakllantirib, bu o‘z navbatida Bank ish faoliyatiga korrupsiya va poraxo‘rlik mutlaqo qarshilik yondashuvining kuzatilishi hamda amal qilinishini o‘z ichiga oladi.

7.2. Xavf-xatarlarni baholash

Bank poraxo‘rlik va korrupsiyaviy xavf-xatarni yilda bir marotaba baholab borilishini ta’minlaydi.

Xavf-xatarlarni baholash ABC xodimi tomonidan amaldagi milliy qonunchilik va xalqaro standartlar talablariga muvofiq amalga oshiriladi.

- The degree of expression of the potential Risk Impact criteria is evaluated on a 3-point scale: significant - 3 points, medium - 2 points, insignificant - 1 point (Appendix No. 3);
- The level of corruption risks is determined by combining the previously calculated parameters of the probability of realizing corruption risk at a critical point and the potential impact of its realization;
- The calculation of the level of corruption risk is carried out using the Matrix of Corruption Risks (Appendix No. 4) according to the formula:

The level of corruption risk = Probability x Impact

- The obtained values form the risk level: low, medium, high

Risk level	Quantitative expression (in points 1-9)
Low risk	1 - 3 points
Medium risk	4 - 6 points
High risk	7 - 9 points

- Based on the results of the risk level assignment, a consolidated Map of corruption risks is formed (Appendix No. 5).

7.2.2. Measures to eliminate or minimize bribery and corruption risks:

- ✓ detailed regulation of the method and time-frame of actions by an employee at the «critical point»;
- ✓ redistribution of functions among Bank staff;
- ✓ transparency of transactions and disclosure of information;
- ✓ avoidance of conflicts of interest;
- ✓ review of the Bank's internal documents, procedures and projects for the presence of corruption factors within their content;

7.2.1. Poraxoʻrlik va korrupsiyaviy xavf-xatarning baholanishi quyidagi tartibda amalga oshiriladi:

- 1-ilovaga muvofiq, ushbu tartibda bankning faoliyati alohida biznes jarayonlari shaklida taqdim etiladi, ularning har birida tarkibiy qismlar (ichki jarayonlar) ajratib koʻrsatiladi;
- «Zaif nuqtalarni» aniqlash - har bir biznes jarayonda korrupsiyaga oid huquqbuzarliklar yuzaga kelish ehtimoli yuqori boʻlgan tarkibiy qismlarni (ichki jarayonlarni) aniqlash;
- Zaif nuqtada korrupsiyaviy xavf-xatarni baholash uchun uning miqdoriy (ballardagi xavf-xatar darajasi) va sifat (yuqori/ahamiyatli xavf-xatar, oʻrta, past/arzimas ahamiyatga ega xavf-xatar) ifodalari qoʻllaniladi;
- Korrupsiya xavf-xatari darajasini baholash uning amalga oshish ehtimoli va bank faoliyatiga ta’sir qilish ehtimoli mezonlari asosida amalga oshiriladi;
- Xavf-xatar ehtimoli mezonining ifodalanish darajasi 3-ballik shkala boʻyicha baholanadi: yuqori – 3 ball, oʻrta – 2 ball, past – 1 ball (2-ilova);
- Korrupsiya xavf-xatari ehtimolining oʻrtacha qiymatini hisoblash va intervallar bilan muvofiqlashtirish jarayoni quyidagilarni oʻz ichiga oladi:
  - ✓ Barcha mezonlarning baholarini toʻplash;
  - ✓ Hisoblangan umumiy bal summasini mezonlar soniga boʻlib, oʻrtacha qiymatini hisoblash;

(Ehtimolning oʻrtacha qiymati = barcha mezonlarni baholash yigʻindisi / mezonlar soni)

- ✓ Olingan oʻrtacha qiymatni ehtimol intervallari bilan moslash:

Ehtimol	Ball	Diapazon
Past	1	1.0 - 1.49
Oʻrta	2	1.5 - 2.49

- ✓ providing protective measures to the Bank's employees in the case of the report of conflict of interest in the Bank or bribery and corruption action;
- ✓ mandatory training and testing of staff for knowledge and understanding of the basic requirements in the field of anti-bribery and corruption.

7.2.3. During the assessment of bribery and corruption risks, the ABC officer may request the necessary documents from other departments and involve other employees of the Bank, as well as independent experts or specialists, with the prior consent of the Bank's management.

7.2.4. Monitoring and Report
The Monitoring of bribery and corruption risks is carried out by the ABC officer by collecting information on signs and facts of bribery and corruption and investigation of bribery and corrupt practices of the Bank’s employees.
Head of SACC Part which became aware of facts of violations in anti-bribery and corruption field should convey such information to the Compliance Committee, Chairman of the Management Board or if necessary to the Supervisory Board of the Bank.
ABC officer submits a report on the results of monitoring bribery and corruption risks in the Bank's activities to the line manager – Head of Compliance Department and Head of SACC Part for review and further submission to the Chairman of the Management Board and Compliance Committee on a regular basis every calendar year.

7.3. Due diligence
The Bank performs due diligence with respect to its clients, agents, contractors and suppliers in order to minimize the risk

Yuqori	3	2.5 - 3.0

- Xavf-xatar ta’siri mezonining ifodalanish darajasi 3-ballik shkala bo‘yicha baholanadi: ahamiyatli – 3 ball, o‘rta – 2 ball, arzimas ahamiyatga ega – 1 ball (3-ilova);
- Korrupsiya xavf-xatarlari darajasi avval hisoblangan xavf-xatar amalga oshish ehtimoli parametrlari va uning amalga oshishining potensial ta’sirini birlashtirish orqali aniqlanadi;
- Korrupsiya xavf-xatari darajasini hisoblash Korrupsiya xavf-xatari matritsasidan foydalanish orqali (4-ilova) quyidagi formula bo‘yicha amalga oshiriladi:

Korrupsiya xavf-xatari darajasi = Ehtimol x Ta’sir

- Olingan qiymatlar xavf-xatar darajasini tashkil etadi: past, o‘rta, yuqori

Xavf-xatar darajasi	Miqdoriy ifoda (1-9 ball)
Yuqori darajadagi xavf-xatar	1-3 ball
O‘rta darajadagi xavf-xatar	4-6 ball
Past darajadagi xavf-xatar	7-9 ball

- Xavf-xatar darajasini baholash natijalariga ko‘ra korrupsiya xavf-xatarlarining umumlashtirilgan xaritasi shakllantiriladi (5-ilova).

7.2.2. Poraxo‘rlik va korrupsiyaviy xavf-xatarni bartaraf etish yoki kamaytirishga qaratilgan chora-tadbirlar:
- ✓ «zaif nuqtada»gi xodimning harakatlari uslubi va ish vaqtini batafsil tartibga solish;
- ✓ Bank xodimlari o‘rtasida funksiyalarni qayta taqsimlash;

of involvement in acts of bribery or corruption. The counterparty's due diligence procedure is carried out by the Compliance Department according to established procedure. 7.4. <u>Training and awareness</u> The ABC officer shall provide appropriate mandatory anti-bribery/corruption training and post-training assessment upon recruitment and on a regular basis to all relevant emloyees to make them aware of the types of bribery and corruption, the risks of engaging in bribery, how they may report bribery and corruption and to maintain the ethical standards the Bank is committed to. The ABC officer keeps training material and Bank employees' knowledge up to date. 7.5. <u>Whistleblowing, investigations, protectionto whistleblower</u> Whistleblowing - is a process of reporting on the basis of reasonable belief on attempted, suspected or actual bribery and corruption. An employee, client, counterparty of the Bank, another person, upon detection of actions, inactions, suggestions from other employees, counterparties, other persons that can be regarded as involvement of the Bank and its employees in any possible act of bribery or corruption may report this to the Bank through the following communication channels: ✓ hotline: + 998 78 120-28-71; ✓ e-mail: <u>commission@kdb.uz</u>; ✓ to complete an anonymous questionnaire on the official website of the Bank in the section «Anti-corruption»: <u>https://kdb.uz/ru/interactive-services/surveys-question</u> ✓ anonymous box. Registration of all bribery and corruption whistleblowing reports is carried out by	✓ operatsiyalarning shaffofligi va ma'lumotlarning oshkor qilinishi; ✓ manfaatlar to'qnashuviga yo'l qo'ymaslik; ✓ Bankning ichki qoidalari, tartiblari va loyihalari mazmunini korrupsiyaviy omillarning mavjudligi nuqtai-nazaridan ko'rib chiqish; ✓ Bankdagi manfaatlar to'qnashuvi yoki poraxo'rlik va korrupsiyaga doir harakati to'g'risida xabar qilingan taqdirda, Bank xodimlarini himoya qilish choralarini ko'rish; ✓ xodimlarni poraxo'rlik va korrupsiyaga qarshi kurashish sohasidagi bilimi va asosiy talablarni tushunishi uchun majburiy o'qitish va sinovdan o'tkazish. 7.2.3. Poraxo'rlik va korrupsiyaviy xavf-xatarlarni baholash davomida ABC xodimi boshqa boshqarmalardan kerakli hujjatlarni so'rab olish hamda Bankning boshqa xodimlarini jalb qilish, shuningdek Bank rahbariyatining oldindan roziligini olgan holda mustaqil ekspertlar yoki mutaxassislarni jalb qilishi mumkin. 7.2.4. Monitoring va Hisobot Poraxo'rlik va korrupsiyaviy xavf-xatarlar bo'yicha monitoring olib borish ABC xodimi tomonidan imzolar hamda poraxo'rlik va korrupsiya holatlari to'g'risida ma'lumotlar to'plash hamda Bank xodimlarining poraxo'rlik va korrupsiyaga doir amaliyotlarini tekshirish vositasida amalga oshiriladi. Poraxo'rlik va korrupsiyaga qarshi kurashish sohasidagi huquqbuzarlik holatlaridan xabardor bo'lgan SACC bo'linmasi boshlig'i mazkur ma'lumotlarni Komplayens qo'mitasiga, Boshqaruv raisiga yoki zarur bo'lganda Bank Kuzatuv kengashiga yetkazishi lozim. ABC xodimi Bank faoliyatidagi poraxo'rlik va korrupsiyaviy xavf-xatarlar bo'yicha olib borilgan monitoring natijalari to'g'risidagi hisobotni muntazam ravishda har kalendar yilda ko'rib chiqish uchun yo'nalish menejerlari -

ABC officer on the day of its receipt in electronic Register of notifications (Appendix No.6). The information contained in the whistleblowing report shall be verified by ABC officer within 10 working days of the registration of the notice. If necessary, the period may be extended, but not more than up to 30 calendar days from the date of registration of the notice. ABC officer is entitled to request and receive from employees of structural units and officials of the Bank information and documents (including written explanations) necessary for the verification of the information contained in whistleblowing reports. Based on the results of a preliminary investigation, ABC officer makes one of the following decisions: ✓ close the proceedings in case of non-confirmation of the facts stated in the whistleblowing report; ✓ close the proceedings if the information provided does not contain factual data that can be verified; ✓ in case of confirmation of the facts of the bribery and corruption offense the conclusion with the attachment of the investigation materials is submitted for the review to the line managers - Head of Compliance Department and Head of SACC Part with further submission to Compliance Committee for a decision-making. The whistleblower is provided with information on the results of the investigation within 30 calendar days from the date of contacting the Bank. Head of SACC Part will liaise with external parties including law enforcement authorities and make reports to those authorities if considered necessary. By keeping the whistleblowing reports strictly confidential, whistleblowers are protected from being subject to any discrimination or unfair treatment in relation to their report. No employee of the Bank will be subject to sanctions if he reported the alleged fact of bribery and corruption, if he refused to give	Komplayens boshqarmasi boshligʻI va SACC boʻlinmasi boshligʻiga hamda navbatdagi boʻysunuv tartibida Boshqaruv raisiga va Komplayens qoʻmitasiga taqdim qilib boradi. 7.3. <u>Lozim darajada tekshirish</u> Poraxoʻrlik yoki korrupsiyaviy harakatlarga jalb qilish xavf-xatarlarini minimallashtirish maqsadida, Bank oʻz mijozlari, agentlari, shartnomalar boʻyicha hamkorlari va ta’minotchilariga nisbatan lozim darajada tekshirishni amalga oshiradi. Kontragentga nisbatan lozim darajada tekshirish Komplayens boshqarmasi tomonidan oʻrnatilgan tartibda amalga oshiriladi. 7.4. <u>Oʻqitish va ogohlik</u> Bankka xodimlarni qabul qilish mobaynida hamda barcha tegishli xodimlarga doimiy ravishda ABC xodimi tomonidan poraxoʻrlik va korrupsiyaga qarshi kurashish, poraxoʻrlik va korrupsiyaning barcha turlaridan ogoh boʻlish, poraxoʻrlikka jalb qilish xavf-xatarlari, poraxoʻrlik va korrupsiya haqida xabar berish va Bankning axloqiy me'yorlariga amal qilish yuzasidan tegishli majburiy oʻqitish va oʻqitishdan keyingi baho berish ishlari amalga oshiriladi. ABC xodimi oʻquv materiallari va Bank xodimlarining bilimlarini zamonaviy talablarga mos ravishda takomillashtirib boradi. 7.5. <u>Fosh qilish, tekshiruvlar va xabardor qiluvchini himoya qilish</u> Fosh qiluvchi xabarlarni taqdim qilish - bu poraxoʻrlik va korrupsiyaga urinish, gumon qilinish yoki sodir etilgan huquqbuzarlik toʻgʻrisida hisobot berish jarayoni. Bank xodimi, mijozi, kontragenti yoki boshqa shaxs Bankning boshqa xodimlari, kontragentlari va boshqa shaxslar tomonidan Bank va uning xodimlarini har qanday poraxoʻrlik yoki korrupsiyaviy harakatlarga jalb qilish sifatida baholanishi mumkin boʻlgan

or receive a bribe, if he refused to mediate in giving or in receiving a bribe. 7.6. <u>Record keeping</u> 7.6.1. All financial transactions must be accurately, correctly and with a sufficient level of detail reflected in the accounting of the Bank, based on true and reliable data, documented and available for verification. 7.6.2. Misrepresentation or falsification of the Bank's financial statements is strictly prohibited and regarded as fraud. **8. Periodic review of procedure and continuous improvement** 8.1. The procedure is subject to timely review of its suitability, acceptability, efficiency, based on the results of audits, as well as updating in cases of changes in anti-corruption legislation, changes in the Bank's internal approaches to anti-corruption issues, adjustments by Head of SACC Part in coordination with Legal Department. 8.2. Head of SACC Part is responsible for continuous improvement of the procedure by assessment, reflection any changes in applicable laws and the anti-bribery compliance functions in accordance with the ISO 37001:2016.	harakat, harakatsizlik sodir etilganligi yoxud bunga taklif bildirilganligi haqida quyidagi aloqa kanallari orqali Bankka xabar berishlari mumkin: ✓ ishonch telefoni: + 998 78 120-28-71; ✓ elektron pochta: <u>commission@kdb.uz</u>; ✓ Bankning rasmiy veb-saytida «Korrupsiyaga qarshi kurashish» boʻlimida anonim anketani toʻldirish: <u>https://kdb.uz/ru/interactive-services/surveys-question</u> ✓ anonim xabarlar qutisi. Poraxoʻrlik va korrupsiya haqidagi barcha fosh qiluvchi xabarlarni roʻyxatga olish ABC xodimi tomonidan elektron xabarnomalar roʻyxatiga (6-ilova) ushbu xabar kelib tushgan kunidayoq kiritish orqali amalga oshiriladi. Fosh qiluvchi xabarlar toʻgʻrisidagi hisobotda aks etgan ma'lumotlar ABC xodimi tomonidan xabarnoma roʻyxatga olingan paytdan boshlab 10 ish kuni mobaynida tekshirilishi lozim. Zarur hollarda, ushbu muddat xabarnoma roʻyxatga olingan paytdan boshlab 30 kalendar kundan ortiq boʻlmagan muddatga uzaytirilishi mumkin. ABC xodimi Bankning tarkibiy tuzilmalari xodimlari va mansabdor shaxslaridan, fosh qiluvchi xabarlar toʻgʻrisidagi hisobotda qayd etilgan ma'lumotlarni tekshirish uchun zarur boʻlgan ma'lumotlarni hamda hujjatlarni (shu jumladan yozma tushuntirish xatlarini ham) soʻrab olishga haqli. Dastlabki tekshiruv natijalariga koʻra ABC xodimi quyidagi qarorlardan birini qabul qiladi: ✓ fosh qiluvchi xabarlar toʻgʻrisidagi hisobotda qayd etilgan ma'lumotlar oʻz tasdigʻini topmagan taqdirda, mazkur holat yuzasidan ish yuritishni tamomlash; ✓ taqdim etilgan xabarnomada tasdiqlanishi mumkin boʻlgan aniq ma'lumotlar koʻrsatilmagan taqdirda, mazkur holat yuzasidan ish yuritishni tamomlash; ✓ poraxoʻrlik va korrupsiyaviy huquqbuzarlik holatlari oʻz tasdigʻini topgan taqdirda, xulosa va ilovadagi tekshiruv materiallarini

	ko‘rib chiqish uchun yo‘nalish menejerlari bo‘lmish Komplayens boshqarmasi boshlig‘I va SACC boshlig‘iga, so‘ngra bo‘ysunuv tartibida Komplayens qo‘mitasiga holat yuzasidan qaror qabul qilish uchun taqdim etiladi. Bankka fosh qiluvchi ma’lumotlar bilan murojaat qilgan shaxs, mazkur murojaat sanasidan boshlab 30 kalendar kun ichida tekshiruv natijalari yuzasidan xabardor qilinadi. SACC bo‘linmasi boshlig‘i tashqi tomonlar, shu jumladan huquqni muhofaza qilish idoralari bilan aloqalarni amalga oshiradi va zarur hollarda, mazkur idoralarga hisobot taqdim qilib boradi. Fosh qiluvchi xabarlar to‘g‘risidagi hisobot qat’iyan maxfiy tutgan holda, qayd etilgan fosh qiluvchi xabarlarni taqdim qilgan shaxslar har qanday diskriminatsiya hamda adolatsiz munosabatdan ximoyalanganlar. Bankning har qanday xodimi, agar poraxo‘rlik va korrupsiyaviy holatlar to‘g‘risida xabar bergan, pora berish yoki pora olishdan bosh tortgan, shuningdek pora berish yoki pora olishda vositachilik qilishni rad qilgan bo‘lsa, bunday xodimga nisbatan o‘zi shubha ostiga olinayotgan poraxo‘rlik va korrupsiyaviy holat uchun sanksiyalar qo‘llanilmaydi. 7.6. <u>Yozuvlarni yuritish</u> 7.6.1. Barcha moliyaviy operatsiyalar aniq, to‘g‘ri va Bankning buxgalteriya hisobida aks ettirilgan etarlicha tafsilotlar darajasida, haqiqiy va ishonchli ma’lumotlarga asoslanib hujjatlashtirilgan va tekshirish uchun mavjud bo‘lishi kerak. 7.6.2. Bank moliyaviy hisobotini noto‘g‘ri taqdim etish yoki qalbakilashtirish qat’iyan man etiladi va firibgarlik sanaladi. **8. Mazkur tartibni vaqti-vaqti bilan ko‘rib chiqish va doimiy takomillashtirib borish**

	8.1. Amalga oshirilgan tekshiruvlar natijalariga ko‘ra, ushbu tartib muvofiqlik va maqbullik, samaradorlik nuqtai nazaridan o‘z vaqtida ko‘rib chiqilishi, shuningdek korrupsiyaga qarshi kurashish sohasidagi qonunchilikka, Bankning korrupsiyaga qarshi kurashish masalalariga ichki yondashuvlarining o‘zgarishlariga asosan, SACC bo‘inmasi Yuridik boshqarma bilan kelishilgan holda yangilanib borishi lozim. 8.2. ISO 37001:2016 standartlariga muvofiq, korrupsiya va poraxo‘rlikka qarshi kurash sohasidagi qonun hujjatlari va nazorat funksiyalaridagi har qanday o‘zgarishlarni aniqlab borish hamda aks ettirish orqali mazkur tartibning takomillashtirib borilishi uchun SACC bo‘inmasi boshlig‘i mas’ul hisoblanadi.

Appendix No.1

Description of Bank activities and business processes

No.	Business line / Business process	Critical point in the business process	Staff members, responsible for business process
1.	Department name		
1.1			

1-Ilova

Bank faoliyati va biznes jarayonlari tavsifi

No.	Faoliyat yo'nalishi / Biznes jarayoni	Biznes jarayonidagi kritik nuqta	Biznes jarayonlarini amalga oshirish uchun mas'ul lavozim egasi
1.	Bo'linma nomi		
1.1			

Appendix No.2

Criteria for assessing the Probability of corruption risks

Probability	Points	Description
High	**3**	1. The business process activity is not automated. 2. The business process activity is not regulated. 3. Direct contact with individuals or legal entities at the workplace is possible in an uncontrolled manner. 4. Participation of one person in the preparation, review, and adoption of a draft decisions within the framework of the business process activity. 5. A corrupt act was committed during the business process activity (committing a crime was confirmed by the court).
Medium	**2**	1. The business process activity is partially automated. 2. The business process activity is partially regulated. 3. Direct contact with individuals or legal entities at the workplace is possible in a controlled manner. 4. Participation of two persons in the preparation, review, and adoption of project decisions within the business process. 5. There is information about corrupt act committed during the business process activity (committing a crime has not been confirmed by the court).
Low	**1**	1. The business process activity is fully automated. 2. The business process activity is fully regulated. 3. There is no possibility of direct contact with individuals or legal entities at the workplace. 4. Participation of three or more persons in the preparation, review, and adoption of project decisions within the business process. 5. There is no corrupt act or information that a corrupt act has been committed.

Average probability value = Sum of assessments of all criteria / number of criteria

Correlating the obtained average value with probability intervals:

Probability	Points	Range
Low	1	1.0 - 1.49
Medium	2	1.5 - 2.49
High	3	2.5 - 3.0

2-Ilova

Korrupsiyaviy xavf-xatarlar ehtimolini baholash mezonlari

Ehtimol	Ball	Ta'rif
Yuqori	**3**	1. Biznes jarayoni faoliyati avtomatlashtirilmagan. 2. Biznes jarayoni faoliyati tartibga solinmagan. 3. Ish joyida jismoniy yoki yuridik shaxslar bilan bevosita munosabatga kirishish mumkin. 4. Biznes jarayon doirasida loyiha qarorlarini tayyorlash, ko'rib chiqish va qabul qilishda bitta shaxs ishtirok etadi. 5. Faoliyat davomida korrupsiyaga oid jinoyat sodir etilgan (jinoyat ishlari bo'yicha sud hukmi bilan o'z tasdig'ini topgan).
O'rtacha	**2**	1. Biznes jarayoni faoliyati qisman avtomatlashtirilgan. 2. Biznes jarayoni faoliyati qisman tartibga solingan. 3. Nazorat ostida, ish joyida jismoniy yoki yuridik shaxslar bilan bevosita munosabatga kirishish mumkin. 4. Biznes jarayon doirasida loyiha qarorlarini tayyorlash, ko'rib chiqish va qabul qilishda ikkita shaxs ishtirok etadi. 5. Faoliyat davomida korrupsiyaga oid jinoyat sodir etilgan (jinoyat ishlari bo'yicha sud hukmi bilan o'z tasdig'ini topmagan).
Past	**1**	1. Biznes jarayoni faoliyati avtomatlashtirilgan. 2. Biznes jarayoni faoliyati tartibga solingan. 3. Ish joyida jismoniy yoki yuridik shaxslar bilan bevosita munosabatga kirishish mumkin emas. 4. Biznes jarayon doirasida loyiha qarorlarini tayyorlash, ko'rib chiqish va qabul qilishda uch yoki undan ortiq shaxslar ishtirok etadi. 5. Korrupsiyaga oid jinoyatlar yoki ular to'g'risidagi ma'lumotlar mavjud emas.

O'rtacha ehtimollik qiymati = Barcha mezonlar ballarining yig'indisi / mezonlar miqdori

Olingan o'rtacha qiymatning ehtimollik intervallari bilan nisbati:

Ehtimol	Ball	Diapazon
Past	1	1.0 - 1.49
O'rtacha	2	1.5 - 2.49
Yuqori	3	2.5 - 3.0

Appendix No.3

Criteria for assessing the potential Impact of corruption risks

Degree of potential Impact	Points	Description
Significant	**3**	— Significant consequences — Significant undermining of the bank's authority at both national and international levels — Inability to internally resolve the issue
Medium	**2**	— Moderate consequences — Damage to the bank's reputation at the local level — Possibility of internal resolution of issue
Insignificant	**1**	— Insignificant consequences — Absence or presence of minor omissions in business/process activities — Possibility of internal resolution of issue

3-Ilova

Korrupsiyaviy xavf-xatarlarning potensial ta'sirini baholash mezonlari

Potensial ta'sir darajasi	Ball	Ta'rif
Ahamiyatga ega	**3**	— Ahamiyatga ega oqibatlar. — Bankning milliy va xalqaro darajadagi obro'siga sezilarli darajada putur yetkazilishi. — Masalani ichki tartibda hal qilishning imkonsizligi.
O'rtacha	**2**	— O'rtacha oqibatlar. — Bankning mahalliy darajada obro'siga putur yetkazilishi. — Ichki tartibda hal qilish imkoni mavjudligi.
Arzimas ahamiyatga ega	**1**	— Arzimas ahamiyat kasb etuvchi oqibatlar. — Biznes/jarayon faoliyatida arzimas ahamiyat kasb etuvchi buzilishlarning mavjud emasligi yoki mavjudligi. — Ichki tartibda hal qilish imkoni mavjudligi.

Appendix No.4

Matrix of corruption risks

			Probability		
			Low	Medium	High
			1	2	3
Impact	Significant	3	3	6	9
	Medium	2	2	4	6
	Insignificant	1	1	2	3

The level of corruption risk = Probability x Impact

Quantitative gradation of the level of corruption risk

Risk level	Quantitative expression (in points 1-9)
Low risk	1 - 3 points
Medium risk	4 - 6 points
High risk	7 - 9 points

4-Ilova

Korrupsiyaviy xavf-xatar matritsasi

			Ehtimol		
			Past	O'rtacha	Yuqori
			1	2	3
Ta'sir	Ahamiyatga ega	3	3	6	9
	O'rtacha	2	2	4	6
	Arzimas ahamiyatga ega	1	1	2	3

Korrupsiyaviy xavf-xatari darajasi = Ehtimol x Ta'sir

Xavf-xatar darajasi	Miqdoriy ifoda (1-9 ball)
Past darajadagi xavf-xatar	1 - 3 ball
O'rta darajadagi xavf-xatar	4 - 6 ball
Yuqori darajadagi xavf-xatar	7 - 9 ball

Korrupsiyaviy xavf-xatar darajasining miqdoriy gradatsiyasi

Appendix No.5

Map of corruption risks

Critical point in the business process	Regulatory and legal framework governing the business process	The level of corruption risk			Measures for preventing, minimization (elimination) of corruption risks	
		Probability	Impact	Risk level	Ongoing	Recommended
Department name						

5-Ilova

Korrupsiyaviy xavf-xatarlar xaritasi

Biznes jarayonidagi kritik nuqta	Biznes jarayonini tartibga soluvchi normativ-huquqiy baza	Korrupsiyaviy xavf-xatar darajasi			Korrupsiyaviy xavf-xatarlarni oldini olish, minimallashtirish (bartaraf etish) choralari	
		Ehtimol	Ta'sir	Xavf-xatar darajasi	davom etayotgan	tavsiya etilgan
Bo‘linma nomi						

Appendix No. 6

Register of notifications

Registration number	Date and time of registration of the notification	Full name, position of the person who submitted the notification	The content of the notification	Information about the verification results	Information about the decision	Full name of the person, registering the notification	Remarks
1	2	3	4	5	6	7	8

6-Ilova

Bildirishnomalar reestri

Ro'yxatga olish raqami	Bildirishnoma ro'yxatga olingan sana va vaqt	To'liq ismi, bildirishnomani taqdim etgan shaxsning lavozimi	Bildirishnoma mazmuni	Tekshiruv natijalari haqida ma'lumot	Qaror haqida ma'lumot	Bildirishnomani ro'yxatga olgan shaxsning to'liq ismi	Izohlar
1	2	3	4	5	6	7	8

30/2025

18 aprel / 18 April 2025

LEGAL OPINION

YURIDIK XULOSA

Legal review carried out by Yuridik ekspertiza o'tkazdi	Legal department / Yuridik boshqarma
The title of the Internal Act subject to legal review Yuridik ekspertiza o'tkazil-gan ichki me'yoriy hujjat nomi	*Procedure on combatting bribery and corruption* *Poraxo'rlik va korrupsiyaga qarshi kurashish Tartibi*
Legal acts applied in the process of legal review **Yuridik ekspertiza jarayonida qo'llanilgan normativ-huquqiy hujjatlar**	1. The Law "On Banks and Banking activities" (New edition)/ "Banklar va bank faoliyati to'g'risida"gi Qonun (Yangi tahriri); 2. The Law "On Combating Corruption" / "Korrupsiyaga qarshi kurashish to'g'risida"gi Qonun; 3. The Law "On conflict of interests" / "Manfaatlar to'qnashuvi to'g'risida"gi Qonun; 4. Decree of the President of the Republic of Uzbekistan "On additional measures on improvement of the anti-corruption system in the Republic of Uzbekistan" #DP-6013 dd 29.06.2020 / O'zbekiston Respublikasi Prezidentining 29.06.2020y. PF-6013-son "O'zbekiston Respublikasida korrupsiyaga qarshi kurashish tizimini takomillashtirish bo'yicha qo'shimcha chora-tadbirlar to'g'risida"gi Farmoni. 5. Decree of the President of the Republic of Uzbekistan "On measures to create an atmosphere of intolerance towards corruption, to drastically reduce corruption factors in state and society management and to expand public participation in this process" #DP-6257 dd 06.07.2021 / O'zbekiston Respublikasi Prezidentining 06.07.2021y. PF-6257-son "Korrupsiyaga qarshi murosasiz munosabatda bo'lish muhitini yaratish, davlat va jamiyat boshqaruvida korrupsiyaviy omillarni keskin kamaytirish va bunda jamoatchilik ishtirokini kengaytirish chora-tadbirlari to'g'risida"gi Farmoni. 6. Resolution of the President of the Republic of Uzbekistan "On additional measures for effective organization of anti-corruption activities" #RP-5177 dd 06.07.2021 / O'zbekiston Respublikasi Prezidentining 06.07.2021y. PQ-5177-son "Korrupsiyaga qarshi kurashish faoliyatini samarali tashkil etishga doir qo'shimcha chora-tadbirlar to'g'risida"gi Qarori. 7. Regulation "On corporate management in commercial banks" registered by Ministry of Justice #3254 dd 30.06.2020 / "Tijorat banklarida korporativ boshqaruv to'g'risida"gi Nizom (Adliya vazirligi tomonidan 30.06.2020 y. 3254-son bilan ro'yxatga olingan). 8. Standard regulation on the activities of internal anti-corruption control units (Approved by the order of the Director of the Anti-corruption agency of the Republic of Uzbekistan #27 dd 06.09.2021, registered by the Ministry of Justice on 08.09.2021 #3319) / Korrupsiyaga qarshi ichki nazorat tuzilmalari faoliyati to'g'risidagi Namunaviy nizom (Adliya vazirligi tomonidan 08.09.2021 yil 3319-son bilan ro'yxatga olingan, O'zbekiston Respublikasi Korrupsiyaga qarshi

kurashish agentligi direktorining 06.09.2021y. 27-son buyrug'I bilan tasdiqlangan).

9. Resolution of the Anti-Corruption Agency of the Republic of Uzbekistan, Ministry of Justice of the Republic of Uzbekistan "On approval of the methodology for identifying and assessing corruption risks in the activities of public authority and management bodies, including their territorial divisions, state unitary enterprises and institutions, organizations with state share more than 50 percent" #3383 dd 31.08.2022 / O'zbekiston Respublikasi Korrupsiyaga qarshi kurashish agentligi, O'zbekiston Respublikasi Adliya vazirligining 31.08.2022y. 3383-son "Davlat hokimiyati va boshqaruvi organlari, shu jumladan ularning hududiy bo'linmalari, davlat unitar korxonalari va muassasalari, davlat ulushi 50 foizdan yuqori tashkilotlar faoliyatida korrupsiyaviy xavf-xatarlarni aniqlash va baholash uslubiyotini tasdiqlash to'g'risida"gi Qarori.

10. Regulation "On requirements of the Central Bank on internal rules of commercial banks" registered by Ministry of Justice #916 dd 05.04.2000 / "Markaziy bank tomonidan tijorat banklarining ichki qoidalariga qo'yiladigan talablar to'g'risida"gi Nizom (Adliya vazirligi tomonidan 05.04.2000 y. 916-son bilan ro'yxatga olingan).

This document sets out *Procedure on combatting bribery and corruption* of the Bank.

Current project of the internal act is in compliance with the applicable laws of the Republic of Uzbekistan, decrees and resolutions of the President of the Republic of Uzbekistan, resolutions of the Cabinet of Ministers, legal and regulatory instruments of the Central Bank as well as Regulation "On requirements of the Central Bank on internal rules of commercial banks" registered by Ministry of Justice under #916 dd 05.04.2000 and the requirements of the Bank's Charter.

Mazkur hujjat Bankning *Poraxo'rlik va korrupsiyaga qarshi kurashish Tartibini* belgilab beradi. Ushbu loyiha O'zbekiston Respublikasining amaldagi qonunlari, O'zbekiston Respublikasi Prezidentining farmonlari va qarorlari, Vazirlar Mahkamasining qarorlari, Markaziy bankining normativ-huquqiy hujjatlari, shu jumladan Adliya vazirligi tomonidan 05.04.2000 y. 916-son bilan ro'yhatga olingan "Markaziy bank tomonidan tijorat banklarining ichki qoidalariga qo'yiladigan talablar to'g'risida"gi Nizomda belgilangan ichki qoidalarga qo'yiladigan talablarga hamda Bank Ustavining talablariga muvofiq keladi.

Sanjar Rasulov
Senior legal adviser / Bosh yuriskonsult
Legal Department / Yuridik boshqarma
"KDB Bank Uzbekistan" JSC /
"KDB Bank O'zbekiston" AJ

Agree with legal opinion / Yuridik xulosaga qo'shilaman

Bunyod Islomov
Head / Boshqarma boshlig'i
Legal Department / Yuridik boshqarma
"KDB Bank Uzbekistan" JSC /
"KDB Bank O'zbekiston" AJ

MB Protocol	IMB/LGD/HO/25/48	21.04.2025
On consideration of the internal rules of the Bank / Bankning ichki qoidalarini ko‘rib chiqish to‘g‘risida		
APPROVED By		
Lee Young Lok	Chairman	
Saydakhmedov Saydmakhmud	Deputy Chairman	
Kim Hang Sun	Managing Director	
Lee Chang Hyun	Executive Director	
Kim Hajoong	Executive Director	
Seo Kyoungwan	Executive Director	
Ashrafkhanov Bobir	Executive Director	
Juraev Abrorjon	Chief Accountant	
REVIEWED By		
Islomov Bunyod	Head of Legal Department	
PREPARED By		
Rasulov Sanjar	Senior Legal Adviser	

PROTOCOL OF THE MANAGEMENT BOARD MEETING
BOSHQARUV MAJLISI BAYONNOMASI

Time / Vaqti: 10:00
Place / Joyi: 3, Bukhoro Street, Tashkent / Toshkent shahri,
Buxoro ko‘chasi, 3

AGENDA / KUN TARTIBI:
On consideration of the internal rules of the Bank / Bankning ichki qoidalarini ko‘rib chiqish to‘g‘risida

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As per decision of the Bank's Internal Rules Review Committee #IAR/PLD/HO/25/3 dated April 21, 2025, it is proposed to submit the below listed internal rules for approval by the governing bodies of the Bank.

Based on the abovementioned decision, the Management Board

HAS DECIDED:

1. To agree with the following internal rules and submit them to the Supervisory Board for approval:

- Human resources and code of conduct policy (To be re-approved);
- Risk management policy (To be re-approved);
- Risk management department regulation (To be re-approved);
- Operational resilience procedure (To be newly developed);
- Credit policy (To be re-approved);
- Anti-corruption policy (To be re-approved);
- Policy for prevention and management of conflicts of interest (To be re-approved);
- Regulation on commission for prevention of corruption in JSC "KDB Bank Uzbekistan" (To be re-approved);
- Regulation on compliance department (To be re-approved);
- Regulation on compliance committee (To be re-approved);
- Anti-money laundering & sanctions policy (To be re-approved).

2. To approve the following internal rules:
   - General affairs department procedure (To be revised);
   - SWIFT data security procedure (To be newly developed);
   - Tuition payment procedure (To be revised);
   - Human resources procedure (To be revised);
   - Procedure of client service department-2 (To be revised);
   - Procedure on combating bribery and corruption (To be revised);
   - Know-Your-Customer procedures (To be revised);
   - Sanctions screening procedures (To be revised).

3. To terminate the following internal rules:
   - IT configuration guideline;
   - Business continuity guideline;
   - SWIFT data security guideline.

4. To entrust the Planning Department to take necessary actions to submit the duly approved internal rules to the Central Bank.

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Bank Ichki qoidalarni koʻrib chiqish qoʻmitasining 2025-yil 21-apreldagi IAR/PLD/HO/25/3-sonli qaroriga binoan, unda qayd etilgan ichki qoidalar Bank boshqaruv organlari tomonidan tasdiqlash taklif etilgan.

Yuqorida zikr etilgan qarorga asoslanib, Bank Boshqaruvi

QAROR QILADI:

1. Quyidagi ichki qoidalar ma'qullansin va Kuzatuv kengashiga tasdiqlash uchun kiritilsin:
    - Xodimlar bilan ishlash va odob-ahloq siyosati (Qayta tasdiqlanmoqda);
    - Tavakkalchiliklarni boshqarish siyosati (Qayta tasdiqlanmoqda);
    - Tavakkalchiliklarni boshqarish boshqarmasi nizomi (Qayta tasdiqlanmoqda);
    - Operatsion bardoshlilikni ta'minlash tartibi (Yangidan ishlab chiqilmoqda);
    - Kredit siyosati (Qayta tasdiqlanmoqda);
    - Korrupsiyaga qarshi kurashish siyosati (Qayta tasdiqlanmoqda);
    - Manfaatlar to'qnashuvining oldini olish va boshqarish siyosati (Qayta tasdiqlanmoqda);
    - "KDB Bank O'zbekiston" aksiyadorlik jamiyatining Korrupsiyani oldini olish bo'yicha komissiyasi to'g'risidagi nizom (Qayta tasdiqlanmoqda);
    - Komplayens boshqarmasining nizomi (Qayta tasdiqlanmoqda);
    - Komplayens qo'mitasi to'g'risidagi nizom (Qayta tasdiqlanmoqda);
    - Jinoiy faoliyatdan olingan daromadlarni legallashtirishga qarshi kurashish va sanksiyalar bo'yicha siyosat (Qayta tasdiqlanmoqda).

2. Quyidagi ichki qoidalar tasdiqlansin:
    - Umumiy ishlar boshqarmasining ishlash tartibi (o'zgartirilmoqda);
    - SWIFT ma'lumotlarini saqlash tartibi (Yangidan ishlab chiqilmoqda);
    - Ta'lim uchun to'lovni amalga oshirish tartibi (o'zgartirilmoqda);
    - Xodimlar bilan ishlash boshqarmasi ish tartibi (o'zgartirilmoqda);
    - Mijozlarga xizmat ko'rsatish boshqarmasi-2 tartibi (o'zgartirilmoqda);
    - Poraxo'rlik va korrupsiyaga qarshi kurashish tartibi (o'zgartirilmoqda);
    - O'z mijozingni biling tartibi (o'zgartirilmoqda);
    - Sanksiyalarni tekshirish tartibi (o'zgartirilmoqda).

3. Quyidagi ichki qoidalar bekor qilinsin:
    - ATni sozlash bo'yicha yo'riqnoma;
    - Faoliyat uzluksizligini ta'minlash yuzasidan qo'llanma;
    - SWIFT ma'lumotlarini saqlash yo'riqnomasi.

4. Rejalashtirish boshqarmasi zimmasiga, mazkur ichki qoidalar o'rnatilgan tartibda tasdiqlangach, ularni Markaziy bankka taqdim etish choralarini ko'rish vazifasi yuklatilsin.