



**REGISTERED AT THE DEPARTMENT FOR BANK TRANSACTIONS
METHODOLOGY OF
“TRASTBANK” PRIVATE JOINT STOCK COMMERCIAL BANK**

**April 27, 2021
No 167B**

**RESOLUTION
of
Supervisory board of
“Trastbank” Private Joint Stock Commercial Bank”
regarding the approval of “Anti-corruption policy**



**RESOLUTION
OF
SUPERVISORY BOARD OF**

“TRASTBANK” PRIVATE JOINT STOCK COMMERCIAL BANK”

regarding the approval of “Anti-corruption policy

In accordance with “the Regulation regarding requirements imposed by the Central Bank on the internal regulatory documents of commercial banks” approved with the resolution No 3/6 dated February 22, 2000 (registration number is 916, April 5, 2000), the Supervisory board of “Trastbank” private joint stock commercial bank **decides:**

1. Approve the anti-corruption policy of “Trastbank” private joint stock commercial bank in accordance with the attachment.
2. This decision enters into force from the morning of the day of its registration in the register of internal normative documents of the Bank.

Chairman of the Supervisory Board

T.Sharipov

Tashkent city,
April 16, 2021,
No 43

ATTACHMENT to the resolution No 43 dated April 16, 2021 of
“Trastbank” private joint stock commercial bank

Anti-corruption policy of “Trastbank” private joint stock commercial bank

*This Policy has been amended and supplemented as follows:
Internal normative document approved with the resolution No 172 dated december 7, 2021
and registered under No 598 of the Board of the Bank.*

Content

- 1-§. General provisions
- 2-§. The purpose and main principles of fighting corruption
- 3-§. Corrupt practices and reporting mechanisms
- 4-§. Cooperate with bodies and organizations implementing and participating in anti-corruption activities
- 5-§. Corruption prevention measures
- 6-§. Liability for corruption offences
- 7-§. Not to disclose the employee (person) who gave information about corrupt actions
- 8-§. The procedure for submitting a report on the areas of activity, rights and anti-corruption activities of the Compliance and Control Department in the field of combating corruption
- 9-§. Miscellaneous.

This document has been developed in accordance with the law “regarding Banks and Banking activities” and the laws “on combating corruption” of the Republic of Uzbekistan, decree of the Present of the Republic of Uzbekistan No PF-5729 dated May 27, 2019 “On additional measures to improve the anti-corruption system in the Republic of Uzbekistan” and decree No PF-6013 dated June 29, 2020 “On measures to further improve the anti-corruption system in the Republic of Uzbekistan”, ISO 37001:2016 “Anticorruption system: requirements and recommendations for use” international standard and it specifies the purpose and principles of combating corruption, corrupt practices and the mechanism for reporting them, measures to prevent corruption, and liability for corruption-related offenses at “Trastbank” private joint stock commercial bank (hereinafter referred in as the Bank). *(Internal normative document approved with the resolution No 172 dated december 7, 2021 and registered under No 598 of the Board of the Bank)*

Chapter 1. General provisions

1. Following terms and definitions are used in this document:

Head bank – Bank management administration;

Branch – Bank's Transactions Department and branches;

Corruption – Unlawful use of an employee's position or position of office for personal gain

or for the benefit of other persons, whether material or non-material, as well as unlawful provision of such benefit;

Violation relation to the corruption – an act that has signs of corruption, for the commission of which liability is provided by law;

corruption factor – Norms of the bank's internal normative documents (their drafts) that create the possibility of committing corruption-related offenses and create corruption;

conflict of interest – The Bank and the following persons: Bank customers, Bank shareholders, Bank supervisory board members, Bank management members, Bank employees, Bank related persons, depositors, creditors, other persons interested in the Bank, the last beneficial owners, the state of violation of interests that may arise as a result of mutual relations and communications.

2. The Bank implements an anti-corruption policy to prevent corruption, assess corruption risks arising in the implementation of the tasks and functions assigned to the Head Office and branches of the Bank, eliminate the systemic causes and conditions of corruption-related offenses, and ensure openness and transparency of activities to prevent and combat corruption.

3. This Policy applies to all employees of the Bank.

Chapter 2. The purpose and main principles of fighting corruption

4. The goal of the fight against corruption is to drastically reduce and eliminate the risk of banks and employees engaging in corrupt practices.

5. The Main principles of combating corruption are as follows:

a) legality – the fight against corruption is carried out in accordance with the Law of the Republic of Uzbekistan "On Combating Corruption" and other regulatory legal acts, as well as this Policy;

b) Priority of the rights and legal interests of Bank customers, Bank shareholders, depositors, creditors, other persons interested in the Bank, final beneficial owners;

c) openness and transparency – providing public participation in fighting against the corruption;

d) systematicity – Ensuring the completeness and continuity of the processes of identifying and reporting corrupt acts in the fight against corruption, cooperating with state bodies carrying out anti-corruption activities, holding accountable for corruption-related offenses, and taking measures to prevent corruption;

e) Cooperation of bodies and organizations involved in banking and anti-corruption activities and participating in it;

f) priority of measures to prevent corruption;

g) the inevitability of responsibility for the offense of corruption committed.

Chapter 3. Corrupt practices and reporting mechanisms

6. Corruption actions are as follows:

- a) to give or receive a bribe;
- b) to mediate in the giving or receiving of a bribe;
- c) to abuse of official position or authority;
- d) bribery in business;

e) Illegal use of official position by a senior official for personal (non-material) benefit or for the benefit of another person.

7. Reporting of corrupt acts is carried out in accordance with the "Regulations on the procedure for identifying, reporting and taking measures against improper actions in the system of the private joint-stock bank "Trastbank".

8. Responsibility for ensuring the functioning of the mechanism for reporting corruption activities is assigned to the Compliance Control Department of the Central Bank.

Chapter 4. Cooperate with bodies and organizations implementing and participating in anti-corruption activities

9. The Bank cooperates with the following government bodies and organizations that directly implement and participate in anti-corruption activities:

- a) Anticorruption agency of the Republic of Uzbekistan;
- b) General Prosecutor office of the Republic of Uzbekistan;
- c) State Security Service of the Republic of Uzbekistan;
- d) Ministry of internal affairs of the Republic of Uzbekistan;
- e) Ministry of justice of the Republic of Uzbekistan;

f) Department for fighting against economic crimes at the General Prosecutor Office of the Republic of Uzbekistan;

g) Republican Interdepartmental Commission on Combating Corruption.

10. The Compliance and Supervision Department of the Central Bank is responsible for reporting corruption-related offenses to state bodies and organizations directly involved in and involved in anti-corruption activities.

Chapter 5. Corruption prevention measures

11. The Bank takes the following measures to prevent corruption:

a) strengthening the responsibility of managers and other employees in the performance of their assigned tasks;

b) introduction of a quality assessment system for the performance of their service obligations by managers and other employees;

c) monitoring compliance by employees with the norms of the "Corporate Code of Ethics of the Private Joint-Stock Bank "Trastbank" (approved by Resolution No 120 of the Supervisory

Board of the Bank dated October 28, 2020 and registered under No 573 on November 3, 2020);

d) When resolving conflicts of interest that arise in the performance of the duties of the Bank's supervisory board and Bank management members and other employees of the Bank, providing the monitoring over compliance with the norms of ““Policy for preventing and eliminating conflicts of interest at Trastbank Private Joint Stock Bank” (Approved by the Bank's Supervisory Board Resolution No 143 dated December 17, 2020 and registered on December 24, 2020 under No 152B);

e) introducing a system of selection and promotion of employees based on the principles of personal and professional qualities, openness, impartiality, fairness and impartiality;

f) to ensure compliance by management staff with the requirements of legal documents regarding the appeals of individuals and legal entities, full, impartial and timely review of appeals, taking measures within their powers to restore the violated rights of individuals and legal entities and protect their legal interests;

g) Regular monitoring of the implementation of measures to prevent corruption in the bank's activities, assessing the effectiveness of the measures taken by the Compliance and Control Department of the Central Bank;

h) conducting an anti-corruption examination of internal normative documents (their drafts) from the point of view of the presence of corruption factors in them;

i) ensuring effective social protection, financial support and encouragement of managers and other employees.

The Bank may also implement other measures to prevent corruption.

12. Managers and other employees must comply with the law, perform their official duties impartially, objectively, conscientiously, in compliance with the rules of ethics, and refrain from committing any corruption-related offenses or from any actions that create conditions for committing such offenses.

Chapter 6. Liability for corruption offences

13. An employee (person) who commits a corruption offense shall be held liable in accordance with the legislation of the Republic of Uzbekistan.

An employee (person) who has committed a corruption offense may be deprived of certain rights, including the right to hold certain positions, by court decision, in accordance with the legislation of the Republic of Uzbekistan.

Chapter 7. Nondisclosure of the employee (person) who gave information about corrupt actions

14. The bank undertakes not to disclose the employee (person) who provided information about corrupt activities.

Prosecution of an employee (person) who provides information about corrupt practices shall entail liability in accordance with the legislation of the Republic of Uzbekistan.

The provisions of this paragraph shall not apply to an employee (person) who knowingly provides false information about corrupt actions, who shall be liable in accordance with the legislation of the Republic of Uzbekistan.

**Chapter 8. The procedure for submitting
a report on the areas of activity,
rights and anti-corruption activities of
the Compliance and Control Department
in the field of combating corruption**

15. The areas of activity of the Compliance-Control Department, which was established in order to fight against corruption in the bank, are as follows:

a) To provide a systematic analysis of the corruption situation in the bank, as well as to determine the causes and conditions of banking services with a high risk of corruption and the commission of corruption offenses;

b) determine and implement the Bank's policy in the field of preventing and combating corruption, as well as measures aimed at eliminating the systemic causes and conditions of corruption-related offenses and increasing the effectiveness of anti-corruption measures;

c) To develop and implement a comprehensive set of measures aimed at increasing the legal awareness and legal culture of bank employees, disseminating information on the prevention and fight against corruption, and organizing training on combating corruption, thereby forming an uncompromising attitude towards all forms of corruption in the Bank;

d) Conducting anti-corruption expertise of the bank's internal regulatory documents and their drafts jointly with the Legal Services Department of the Main Bank;

e) Development and implementation of proposals for improving legislation in the field of preventing and combating corruption, introducing international standards and best foreign practices;

f) taking measures to introduce the honesty standard ("honesty vaccine") and conflict of interest resolution standards into banking services, as well as monitoring their compliance;

g) Analysis of the effectiveness of the anti-corruption control system in the field of the bank's own funds and attracted resources, the use of loans from international financial organizations and foreign banks, the realization of bank assets and bank purchases, as well as the development of proposals for its improvement;

h) developing cooperation with bodies and organizations implementing and participating in anti-corruption activities, and implementing systematic measures to strengthen the Bank's image and increase its position in local and international ratings;

i) Organizing analytical work on the state, trends and causes of corruption and the effectiveness of anti-corruption measures, developing proposals to increase the effectiveness of preventing and combating corruption;

g) Ensuring openness and transparency of activities to prevent and combat corruption in the bank, and to this end, implementing effective cooperation with the media.

16. The Compliance and Control Department periodically (at the end of every quarter) conducts a mandatory assessment of the risks of corruption arising in the implementation of the tasks and functions assigned to the structural structures and branches of the Main Bank, according to its results:

a) forms a list of areas of activity and positions of bank employees who are most exposed to the risk of corruption, as well as their functions (authorities);

b) Performs quarterly monitoring of the implementation of the anti-corruption program in the bank and takes measures to reduce corruption risks to a minimum level.

17. The Compliance Department has the following anti-corruption powers:

a) Request, receive and study materials related to the spending of the Bank's own funds and attracted resources, the sale of Bank assets, Bank purchases, the implementation of investment projects and the implementation of state programs;

b) considering appeals of individuals and legal entities on the issue of corruption and taking measures to restore their violated rights and protect their legal interests;

c) Investigation of the state of corruption in the Bank's management, Bank's management, Main bank (branch) credit commission, Bank's liquidity management committee, structural structures and branches of the Main bank;

d) to determine the reasons and conditions for committing a corruption offense;

e) materials collected as a result of studies and other activities are presented to law enforcement and other state bodies in accordance with the established procedure for taking measures in accordance with the law, including the initiation of criminal proceedings, against employees with signs of corruption-related offenses in their activities;

f) conducting internal investigations into corruption-related offences;

g) Submitting to the Supervisory Board of the Bank proposals for mandatory consideration on suspension or cancellation of the implementation of decisions of the Bank's management, the Credit Commission of the Main Bank (branch), and the Bank's Liquidity Management Committee in cases where signs of corruption are detected in their decisions;

h) Submission of submissions to the chairman of the supervisory board of the bank on taking measures to eliminate the causes and conditions causing corruption, which must be considered.

18. Compliance-control department regarding its anti-corruption activities:

a) Prepares a report on the Bank's anti-corruption activities by March 1 of each year after the end of the financial year and submits it to the Bank's Supervisory Board and the Bank's Management Board for consideration;

b) Performs a comprehensive analysis of corruption violations that damage the Bank's interest and image and informs the Bank's supervisory board and the Bank's management based on the results;

c) Monitors the achievement of full compensation for damages caused to the interests of society, the state and the bank as a result of corruption offenses committed in the bank;

d) The bank analyzes the effectiveness of the anti-corruption examination system of internal normative documents and their projects and makes suggestions for its improvement;

e) Establishes a requirement to implement the "Anti-Corruption Management System: International Standard ISO 37001:2016" to prevent and combat corruption in the banking procurement sector;

f) organizes the development and implementation of regional measures aimed at preventing corruption in branches;

g) submits materials on the state of corruption to state bodies directly implementing anti-corruption activities in accordance with the procedure established by the legislation of the Republic of Uzbekistan.

Chapter 9. Miscellaneous

19. Bank employees are responsible for compliance with the requirements of this Policy.

Employees (persons) who violate the requirements of this Policy will be subject to disciplinary, administrative or criminal liability in accordance with the procedure established by the legislation of the Republic of Uzbekistan.

20. Monitoring of the implementation of this Policy is entrusted to the Compliance Control Department of the Main Bank.

Chairman of the Board

S.Normukhamedov

Agreed with the members of the Board:

Deputy Chairman of the Board	K.Gabbazov
Deputy Chairman of the Board	Z.Kurganov
Director of accounting department	M.Maisova
Director of strategic development	S.Urmanova
Director of economic analyze and statistics	M.Muhammedyarova
Acting director of the legal department	M.Mambetov