

"APPROVED"

Supervisory Board of
JSC "YANGI ANGREN ISSIQLIK
ELEKTR STANSIYASI"

(№ 1/2025 with statement)

Dated 22.07. 2025 y.

2/2026 07.04. 2026 y.

1. General Provisions
1.1. "Yangi Angren issiqlik elektr stansiyasi" (hereinafter referred to as the Company) is committed to the highest standards of ethical and honest conduct. The Company's Anti-Corruption Policy (hereinafter referred to as the Policy) sets out the principles and establishes measures for preventing corruption and establishing a fair and transparent business environment. The Policy extends to all employees, contractors, suppliers, and other stakeholders. The Policy is approved by the Supervisory Board of the Company.

2. Purpose of the Policy

The purpose of this Policy is to make it clear that corruption, in any form and by any means, is strictly prohibited. The Policy defines the principles and rules to be observed by all Company employees and business partners referred to herein, as well as approaches to implementing these rules. At the same time, the Policy takes into account not only the Company's interests, but also the expectations of its stakeholders including employees, customers, shareholders, suppliers, contractors, the local community, and society at large.

3. Scope of Application and Enforcement

This Policy applies to all employees of the Company, as well as to its business partners, including contractors, suppliers, and other stakeholders, as defined in the Policy.

**Anti-Corruption Policy
of JSC "Yangi Angren issiqlik elektr stansiyasi"**

4. The Company's corporate values include honesty, integrity, and transparency. The Company encourages its business partners to be aware of their ethical obligations. The Company makes every effort to ensure that all business partners adhere to the same ethical principles and calls its business partners to take strict measures against corruption.

5. Key Terms and Main Rules

5.1. Bribery (active bribery) is defined as the act of offering, giving, promising, or authorizing any form of benefit, directly or indirectly through a third party, in order to obtain or retain market advantages for oneself or others in business. Bribery (passive bribery) also refers to requesting or receiving any benefit for oneself or others, directly or through a third party, in return for performing or refraining from performing one's professional duties.

5.2. Corruption means the unlawful use of official or job-related powers by an individual for the purpose of obtaining rights or of non-material benefits for themselves or others, as well as the unlawful provision of such benefits.

5.3. Employees of the Company are strictly prohibited from engaging in bribery and other corrupt practices such as nepotism, favoritism, discrimination, or other business partners to carry out their professional duties. The Company takes an absolute stance against bribery, and prohibits individuals in matters of bribery — bribery is unacceptable regardless of the position of the individual.

5.4. As a rule, employees may accept gifts, including representation expenses, entertainment, or travel, provided such gifts are of minimal value as defined by the Company's Conflict of Interest Management Policy and Code of Ethics. With regard to accepting gifts, representation expenses, entertainment, or travel to clients, potential clients, customers, or other business partners, the general rule is that such benefits must always be modest, reasonable, and infrequent. Gifts, entertainment, and entertainment must never be planned, offered, or provided in order to induce third parties to take any action in favor of the Company, reward such an action, or refrain from any action that could harm the Company. Employees should seek advice and

1. General Provisions

JSC “Yangi Angren issiqlik elektr stansiyasi” (hereinafter – the Company) strives to adhere to the highest standards of ethical and honest conduct in its business activities. This Anti-Corruption Policy (hereinafter – the Policy) reflects the Company’s zero tolerance towards corruption and establishes norms for protecting the reputation and interests of its shareholders and stakeholders. The Policy enters into force upon approval by the Company’s Supervisory Board.

2. Purpose of the Policy

The purpose of this Policy is to make it clear that corruption, in any form and under any circumstances, is strictly prohibited. The Policy defines the principles and rules to be observed by all Company employees and business partners referred to herein, as well as approaches to implementing these rules. At the same time, the Policy takes into account not only the Company’s interests, but also the expectations of its stakeholders, including employees, customers, shareholders, suppliers, business partners, the local community, and society at large.

3. Scope of Application and Enforcement

This Policy applies to all employees and senior management of the Company, as well as to “close relatives” as defined in the Conflict of Interest Management Policy.

4. Interaction with Business Partners

The Company cooperates with various business partners, including suppliers, contractors, agents, etc. The Company encourages its business partners to be aware of its ethical standards. The Company makes every effort to ensure that all business partners adhere to the same ethical principles and calls on relevant partners to take strict measures against corruption.

4. Key Terms and Main Rules

5. Bribery (active bribery) is defined as the act of offering, giving, promising, or authorizing any form of benefit, directly or indirectly through third parties, in order to obtain or retain undue advantages for oneself or others in business. **Bribery (passive bribery)** also refers to requesting or receiving any benefit for oneself or others, directly or through a third party, in return for performing or refraining from performing one’s professional duties.

6. Corruption means the unlawful use of official or job-related powers by an individual for the purpose of obtaining material or non-material benefits for themselves or others, as well as the unlawful provision of such benefits.

7. Employees of the Company are strictly prohibited from engaging in bribery and must not use intermediaries such as agents, consultants, distributors, or other business partners to carry out bribery-related activities. The Company makes no distinction between public officials and private individuals in matters of bribery — bribery is unacceptable regardless of the recipient’s status.

8. As a rule, employees may accept gifts, including representation expenses, entertainment, or travel, provided such gifts are of modest value as defined by the Company’s Conflict of Interest Management Policy and Code of Ethics. With regard to offering gifts, representation expenses, entertainment, or travel to clients, potential clients, customers, or other business partners, the general rule is that such benefits must always be modest, reasonable, and infrequent for any recipient. Gifts, hospitality, and entertainment must never be promised, offered, or provided in order to induce the recipient to take any action in favor of the Company, reward such an action, or refrain from any action that could harm the Company. Employees should seek advice and

guidance on such matters from the Compliance Department, which ensures the record-keeping of requests for guidance and recommendations.

9. Gifts are defined as goods or services provided as a sign of friendship or gratitude. A gift is given openly without expecting compensation or value in return. Typically, gifts are given or received to initiate, strengthen, or develop business relationships.

10. Employees are prohibited from accepting cash or financial advantages such as loans or discounts, as well as gifts in the form of more favorable terms in their personal dealings with any current or potential contractors, suppliers, or other counterparties of the Company.

11. Personal benefits include the following:

- **Hospitality** covers meals, banquets, and other similar events. It differs from gifts as hospitality requires the recipient's presence;
- **Entertainment** usually includes attending performances, concerts, and sports events;
- **Travel** is defined as the provision of a travel ticket, accommodation, or reimbursement of travel or accommodation costs by a potential client, customer, or business partner of the Company.

12. The Company does not pay for travel, accommodation, or related expenses of other persons, except in cases explicitly provided for in the contract.

13. Political contributions are cash, material gifts, intangible goods, or services donated or provided to a political party, politician, or political candidate. Such contributions may be used to unlawfully influence political processes or decisions. The Company under no circumstances permits direct or indirect political contributions.

14. Charity may be given in monetary or in-kind form and includes any valuables donated by the Company to support charitable activities in the fields of culture, education, science, social protection, and other areas. Donations are voluntary and intended to help a non-profit organization achieve its goals or cover expenses, without providing significant commercial benefits to the donor.

15. The Company distinguishes two categories of charitable donations:

- one-time financial assistance — a monetary donation to a particular body for the achievement of a general purpose;
- financial participation or grants — covering in full the costs of specific events, activities, or ongoing projects.

Instead of financial support, the Company may provide third parties with donations in the form of goods (tangible or intangible) or services free of charge.

Other types of donations include social projects that develop the Company's core business activities and are financed or created by the Company, being fully related to local communities.

16. Sponsorship is the conduct of an event, provision of services, or engagement in activities that grant the Company certain rights and advantages. For example, transferring funds to a third party to promote and advertise the Company's services.

Cultural sponsorship refers to support of specific cultural events through cooperation with institutions or events connected with culture, aimed at *promoting the Company*. Sponsorship differs from charity in that the sponsor receives something in return, such as advertising or promotion of the Company.

17. As a rule, charity and sponsorship are provided in accordance with applicable law and must never be directly or indirectly connected with unlawful actions or illegal benefits for the Company.

18. Charity and sponsorship may be considered bribery if they are provided or received to induce someone to commit improper acts or as a reward for such acts. They may also be used as hidden transfers to counterparties engaged in corruption.

5. Implementation of the Policy

19. The Compliance Service undertakes to ensure the effective implementation of the Policy through continuous training and awareness-raising of the Company's employees. In particular, the Compliance Service, in cooperation with the HR Department, takes the following measures related to employee training:

- providing the necessary information, including publication of this Policy, through the internet, internal seminars, open discussions, and other means, ensuring employees' awareness of anti-corruption measures;
- familiarizing new employees with the Company's rules on anti-bribery and anti-corruption upon hiring.

20. The Company's Compliance Service is responsible for ensuring adherence to this Policy. It is also responsible for maintaining its relevance and implementing best practices.

21. Each manager, within the scope of their functional responsibilities, must comply with this Policy, set a personal example, and provide appropriate guidance to their subordinates.

22. All employees are responsible for adhering to the principles and rules established by this Policy. Violations of the Policy by employees, identified by the Compliance Service on its own initiative, as well as reports of suspected violations, must be reviewed in accordance with established procedures.

6. Oversight of the Anti-Corruption Policy

23. The Compliance Service reviews the Policy at least once every two years or, if necessary, from time to time, in order to identify required amendments and additions for achieving the Policy's objectives, and to ensure its compliance with applicable legislation, internal policies, and Company procedures.

24. Any amendments to the Policy shall be approved by the Supervisory Board of the Company based on the recommendation of the Anti-Corruption and Ethics Committee established under the Supervisory Board.