



## **OUR ANTI-MONEY LAUNDERING POLICY**

Our Anti-Money Laundering policy is to instil and maintain a culture of compliance with anti-money laundering measures and procedures in line with the law of the Republic of Uzbekistan and with FATF and OECD guidelines.

Ultimate responsibility for overseeing the implementation and review of our policy lies with our Senior Leadership Teams.

### **Our policy**

Money laundering is the term used for offences involving the proceeds of crime or terrorism. This includes possession, or in any way dealing with, or concealing, or converting the process of any crime, as well as funds likely to be used for terrorism or the proceeds of terrorism. Money laundering also describes the activities of criminals who convert the proceeds of crime into legitimate activities with the intention of hiding the true sources of their funds.

In relation to the company, money laundering would be an attempt to do legitimate business with us e.g. paying for goods and services using assets or money derived from the proceeds of crime or terrorism.

Our policy applies to all employees and contractors and sets out the legal requirements relating to money laundering, including how to respond if anyone suspects that money to pay for property, goods or services comes from criminal or terrorist activities and will, where appropriate, include clauses to this effect in relevant contracts.

### **The Law**

Legislation has extended the burden for identifying acts of money laundering from police and government agencies to companies and their employees. Under Uzbekistan law, the principal legislation and regulation related to money laundering are to be found in Law No. 660-II "On Countering Legalization of Income from Criminal Activities, Financing Terrorism and Financing the Dissemination of Weapons of Mass Destruction".

### **The duty of the company**

We have established an Anti-Money Laundering function under the Head of Internal Audit and Compliance with procedures to enable suspicions to be reported and records to be kept.

### **Reporting procedure**

If any employee has any questions about an individual, company or transaction that he/she has been dealing with, he/she should contact the Head of Internal Audit and Compliance as soon as possible.

If there are no reasonable grounds after reviewing the concerns of the employee, the decision to proceed will be recorded and consent given to the transaction. If, on the other hand, there are still outstanding concerns, we shall contact the appropriate authorities without delay.

Within our finance and legal departments, simplified due diligence is carried out when checking all new contractors and suppliers.

### **Training**

The Head of Internal Audit and Compliance will ensure that training on the law relating to money laundering and our internal procedures is provided to all relevant employees on a regular and ongoing basis.

### **Monitoring**

The Head of Internal Audit and Compliance is responsible for the maintenance and operational efficiency of this policy and will liaise with Human Resources when the policy is subject to review in order to ensure all relevant employees are updated.

Our performance will be reported in our Annual Corporate Responsibility Review.