

Reg. No. 04-5/29 June 4, 2026	“APPROVED” by the Supervisory Board of JSC “ANOR BANK”
--	---

Minutes No. 25
dated May 26, 2026

Chairman of the Supervisory Board
of JSC “ANOR BANK”

(Signature)
Sh. N. Nosirov

ANTI-CORRUPTION POLICY
OF JOINT-STOCK COMPANY
“ANOR BANK”

Tashkent - 2026

GENERAL PROVISIONS

1. This Anti-Corruption Policy of JSC “ANOR BANK” (hereinafter referred to as the “Policy”) has been developed in accordance with the Labor Code of the Republic of Uzbekistan, the Laws of the Republic of Uzbekistan “On Combating Corruption”, “On Banks and Banking Activities”, “On Joint-Stock Companies and Protection of Shareholders’ Rights” (as amended), “On Conflict of Interest”, “On Appeals of Individuals and Legal Entities”, “On Combating the Legalization of Proceeds from Criminal Activity, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction”, the Regulation on Corporate Governance in Commercial Banks approved by Resolution No. 12/8 of the Board of the Central Bank of the Republic of Uzbekistan dated May 25, 2020, and registered by the Ministry of Justice of the Republic of Uzbekistan on June 30, 2020 under No. 3254, other legislative acts of the Republic of Uzbekistan, as well as the Charter of Joint-Stock Company “ANOR BANK” (hereinafter referred to as the “Bank”).

2. This Policy is the Bank’s principal internal document defining the objectives, tasks, principles, requirements, and areas of activity in the field of anti-corruption, minimization of corruption risks, as well as prevention, detection, and elimination of corruption-related offenses.

3. This Policy establishes the obligation of the Bank, its employees, shareholders, governing bodies, and other persons authorized to act on behalf of and in the interests of the Bank to comply with the legislation of the Republic of Uzbekistan and voluntarily assumed commitments in the field of anti-corruption, while ensuring the security and integrity of the Bank’s business processes.

4. This Policy applies to all structural divisions of the Bank, its employees (regardless of position held), the Bank’s governing bodies, as well as interested and affiliated parties.

5. The requirements of this Policy shall apply both to the Bank’s internal business processes and to its relations with counterparties, partners, and other third parties. When establishing contractual or other business relationships with counterparties, the requirements of this Policy shall be duly taken into account and observed.

6. The Anti-Corruption Policy is based on the principles of conducting business with integrity and in an ethical manner. The Supervisory Board and the Management Board of the Bank adhere to a policy of zero tolerance for corruption and bribery in any form. All employees of the Bank shall act professionally, fairly, and ethically in all business contacts and relationships, as well as actively implement anti-corruption measures and comply with their requirements.

7. For the purposes of this Policy, the following terms and definitions shall apply:

- **counterparty** - a legal entity, individual entrepreneur, or natural person (including a person engaged in private practice) that has entered into, or intends to enter into, a contractual relationship with the bank, excluding employment relationships;

- **corruption** - the unlawful use by a person of their official or employment position for the purpose of obtaining a tangible or intangible benefit for themselves or for other persons, as well as the unlawful provision of such benefit;
 - **corruption-related offense** - an act containing elements of corruption for which liability is established by law;
 - **conflict of interest** - a situation in which a person's personal interest (direct or indirect) affects or may affect the proper performance of their official or employment duties, and in which a conflict arises or may arise between the person's personal interest and the rights and legitimate interests of citizens, organizations, society, or the state;
 - **anti-corruption - activities** carried out by the bank's employees, members of the bank's governing bodies, and employees of the bank's internal control units within the scope of their authority, aimed at detecting, preventing, suppressing, disclosing, and investigating corrupt practices, eliminating the causes thereof, and minimizing and/or eliminating the consequences of such practices;
 - **charity (charitable activity)** - the gratuitous provision, or provision on preferential terms, of tangible and/or intangible assets in monetary or other forms to legal entities and individuals (recipients of charitable assistance) for the purpose of carrying out specific works, providing services, and achieving other charitable objectives;
 - **international organization** - any international organization established by states, governments, or other international organizations, regardless of its organizational and legal form or authority, including regional economic integration organizations;
 - **employee** - an individual who is in an employment relationship with the bank;
 - **close relatives** - persons related by kinship or close family ties, including parents, siblings, spouses, children (including adopted children), grandparents, grandchildren, as well as parents of a spouse, and the spouse's biological or adopted brothers and sisters;
 - **anti-corruption system** - activities carried out by the Bank, its governing bodies, and employees within the scope of their authority, including:
 - prevention of corruption, including identification and subsequent elimination of the causes of corruption (corruption prevention);
 - identification, prevention, suppression, disclosure, and investigation of corruption-related offenses, as well as conditions facilitating their commission (anti-corruption);
 - minimization and/or elimination of the consequences of corruption-related offenses.
8. The primary objectives of this Policy are to:
- minimize the risk of the Bank and its employees becoming involved in corrupt practices;
 - establish uniform standards and procedures for the prevention of corruption-related offenses and anti-corruption measures applicable to the Bank's

employees, as well as persons acting in the interests of the Bank (agents, intermediaries, representatives, counterparties, and other persons);

- foster among employees, counterparties, and other interested parties a clear understanding that the Bank conducts its business in an honest, transparent, and ethical manner and does not tolerate corruption in any form;
- strengthen personal accountability for failure to comply with the principles and requirements set forth in this Policy.

9. When establishing correspondent relationships, as well as other business relationships with legal entities and individuals registered in or permanently residing in foreign countries or territories characterized by a high level of corruption risk, the Bank shall apply enhanced control measures and Enhanced Due Diligence (EDD) procedures.

II. FUNDAMENTAL ANTI-CORRUPTION PRINCIPLES

10. The Bank's anti-corruption activities are based on the following fundamental principles:

- **Legality** - Anti-corruption measures within the Bank shall be implemented in strict compliance with the legislation of the Republic of Uzbekistan, international best practices in the field of anti-corruption, and the Bank's internal regulatory documents.

- **Zero Tolerance for Corruption** - The Bank adheres to a policy of zero tolerance for corruption in all its forms and manifestations. Employees of the Bank are strictly prohibited from directly or indirectly participating in any activities that may create corruption risks.

- **Openness and Transparency** - The Bank ensures that the public is informed about the anti-corruption measures it implements, while complying with applicable legal requirements relating to information confidentiality and banking secrecy.

- **Preventive, Systematic, and Comprehensive Approach to Anti-Corruption Measures** - The Bank places priority on preventing corruption through the identification and elimination of factors and conditions conducive to corruption-related offenses. Anti-corruption measures and procedures shall be proportionate to the identified corruption risks and integrated into all business processes and functions of the Bank.

- **Inevitability of Accountability** - Employees of the Bank who commit corruption-related offenses shall be held accountable, regardless of their position, in accordance with the legislation of the Republic of Uzbekistan and the Bank's internal regulatory documents.

- **Use of Scientific, Technological, and Information Technology Advancements** - The Bank seeks to actively utilize modern scientific achievements and information and communication technologies in the establishment and development of its anti-corruption system.

- **Right of Direct Access to Management** - Where an employee possesses reliable information regarding corrupt practices, such employee shall have the right, without any obstacles or fear of retaliation, to report such information directly to their immediate supervisor, the Compliance Control Division, or the Supervisory Board of the Bank.

- **Cooperation with Civil Society Institutions** - The Bank supports cooperation with representatives of civil society in order to ensure independent oversight of the implementation of anti-corruption measures.

- **Monitoring, Analysis, and Effectiveness Assessment** - The Bank shall regularly monitor, analyze, and assess the effectiveness of the operation of its Anti-Corruption Management System.

- **Independence of the Compliance Control Function** - The Bank's Compliance Control Division shall possess an adequate degree of independence, shall have the right to communicate directly and without restriction with the Supervisory Board of the Bank on anti-corruption matters, and shall submit regular reports within the prescribed timeframes.

- **Continual Improvement of the Anti-Corruption Management System** - The Bank shall ensure the continual improvement of its Anti-Corruption Management System in order to enhance its effectiveness, strengthen monitoring and control mechanisms, and minimize corruption risks.

III. CORRUPT PRACTICES

11. In accordance with the legislation of the Republic of Uzbekistan, the following acts constitute corruption-related offenses:

- offering, giving, or paying a bribe, including through an intermediary;
- soliciting or receiving a bribe, including through an intermediary;
- commercial bribery;
- abuse of official position or authority;
- any other unlawful use of an official position contrary to the legitimate interests of the Bank, society, or the state for the purpose of obtaining a material or other benefit.

12. Employees of the Bank are prohibited from engaging in any of the acts specified in Clause 11 of this Policy. In particular, employees are prohibited from directly or indirectly, personally or through third parties:

- offering, providing, promising, requesting, or accepting a bribe;
- making payments or providing other benefits for the purpose of facilitating administrative, bureaucratic, or other formal procedures;
- participating in activities that result in or may result in a conflict of interest.

13. The prohibition established under Clause 12 of this Policy applies to all forms of giving or receiving money, assets, services, gifts, entertainment, hospitality, or other benefits involving any individuals or legal entities, including

public officials, representatives of government authorities, commercial organizations, and their employees.

IV. KEY FUNCTIONS AND RESPONSIBILITIES OF THE GOVERNING BODIES, STRUCTURAL DIVISIONS, AND EMPLOYEES OF THE BANK WITHIN THE ANTI-CORRUPTION SYSTEM

14. The Supervisory Board of the Bank is the highest governing body responsible for anti-corruption matters within the Bank and shall:

- approve, within its authority, this Policy and other documents of the Anti-Corruption Management System;
- make decisions on the establishment, reorganization, and liquidation of the Compliance Control Division, with subsequent submission of such decisions for approval by the General Meeting of Shareholders;
- exercise overall oversight of anti-corruption activities and the implementation of anti-corruption measures;
- regularly review reports submitted by the Chairman of the Management Board and the Compliance Control Division on the activities carried out in the field of anti-corruption.

15. The Management Board of the Bank is the executive body responsible for the implementation of the anti-corruption policy and shall:

- approve, within its authority, internal regulatory documents, organizational measures, and procedures relating to anti-corruption, as well as comprehensive and systematic action plans in this area;
- be responsible for ensuring that the Bank's activities comply with applicable anti-corruption legislation;
- ensure the implementation of the principle of zero tolerance for corruption in all forms and manifestations at all levels of the Bank's operations;
- establish, implement, and maintain an effective anti-corruption system;
- monitor compliance with the requirements of this Policy, including ensuring the effective and timely resolution of issues related to the functioning of the Bank's anti-corruption system;
- make decisions concerning the development of the Bank's Anti-Corruption Management System and the implementation of relevant measures.

16. The Compliance Control Division is a specialized structural division of the Bank directly responsible for implementing and coordinating anti-corruption measures and shall:

- monitor compliance by the Bank's employees with the requirements of this Policy and other internal anti-corruption documents;
- ensure the receipt, registration, and review of reports, complaints, and inquiries from citizens, individuals, and legal entities concerning corruption received through the Bank's official communication channels, and inform the Bank's governing bodies of such reports;

- conduct a preliminary review and assessment of reports concerning potential corruption-related offenses;
- where sufficient grounds exist, submit proposals for conducting an internal investigation in accordance with the Regulation on Internal Investigations and the Labor Code of the Republic of Uzbekistan;
- develop and implement measures aimed at identifying, preventing, and suppressing potential corrupt practices by the Bank's employees;
- initiate the application of disciplinary and other liability measures against employees who have committed corruption-related offenses, in accordance with the legislation of the Republic of Uzbekistan and the Bank's internal regulatory documents;
- organize educational and awareness-raising activities on anti-corruption matters (including seminars, round tables, lectures, and training sessions), including with the participation of representatives of government authorities;
- analyze factors and conditions contributing to corruption risks within the Bank and prepare proposals for improving organizational and practical anti-corruption measures;
- monitor developments and amendments in the legislation of the Republic of Uzbekistan relating to anti-corruption and communicate relevant information to the Bank's structural divisions;
- conduct anti-corruption reviews of internal regulatory documents during their drafting and approval stages;
- participate in the development of the Bank's overall anti-corruption methodology;
- cooperate with law enforcement authorities on anti-corruption matters and ensure that materials relating to identified violations are referred to the competent authorities for consideration of the liability of responsible persons in accordance with the legislation of the Republic of Uzbekistan.

17. The Human Resources Department is the primary structural division responsible for fostering an anti-corruption culture, personnel management, and conflict of interest management within the Bank, and shall:

- ensure that all employees of the Bank, including newly hired employees, are familiarized with the requirements of this Policy and other internal anti-corruption documents in order to promote an anti-corruption culture;
- organize and coordinate training and professional development of the Bank's employees on corruption prevention and anti-corruption matters;
- jointly with the Compliance Control Division, organize the identification, prevention, and resolution of conflicts of interest among the Bank's employees;
- ensure the collection and monitoring of the following employee declarations:
 - a) declarations (undertakings) confirming compliance with the requirements of this Policy upon hiring and upon transfer to a new position;
 - b) annual declarations of compliance with the requirements of this Policy.

18. Heads of the Bank's structural divisions shall bear direct responsibility for the implementation of the anti-corruption policy within their respective divisions and shall:

- ensure that all subordinate employees are informed of the requirements of this Policy and other internal anti-corruption documents of the Bank;
- foster and maintain a culture of zero tolerance for corruption within their divisions;
- personally comply with the principles of this Policy and require compliance therewith by subordinate employees;
- promptly inform the Compliance Control Division of any identified indications or facts of potential corruption violations, conflicts of interest, or other breaches of the requirements of this Policy;
- ensure that subordinate employees complete the required training and annual declarations in accordance with this Policy;
- participate in anti-corruption activities conducted by the Bank;
- bear personal responsibility for failure to comply with or improper compliance with the requirements of this Policy within their respective divisions.

19. All employees of the Bank shall:

- strictly comply with the legislation of the Republic of Uzbekistan relating to anti-corruption, as well as with the provisions of this Policy and other internal documents of the Bank;
- perform their duties in accordance with the requirements of the Corporate Code of Ethics and refrain from any actions constituting corruption-related offenses or creating conditions conducive to their commission;
- immediately report to their immediate supervisor and/or the Compliance Control Division any attempts to induce them to commit corruption-related offenses, as well as any known facts of such offenses committed by other employees of the Bank;
- participate in anti-corruption activities and bear personal responsibility for compliance with applicable legislation and the Bank's internal documents in this area;
- avoid any personal interest that gives rise or may give rise to a conflict of interest;
- ensure the protection of commercial secrets and other legally protected information and refrain from using such information for personal gain;
- not use their official position to influence subordinate employees in matters unrelated to the performance of official duties, nor induce or compel subordinates or other persons to commit corruption-related offenses;
- take measures to eliminate factors and conditions that may contribute to conflicts of interest or corruption-related offenses.

20. Persons acting on behalf of and in the interests of the Bank (including agents, intermediaries, consultants, representatives, contractors, and other counterparties):

- shall comply with the principles and requirements of this Policy in the performance of their obligations and activities conducted in the interests of the Bank;
- shall not engage, on behalf of or in the interests of the Bank, in any corrupt practices, including offering, promising, giving, or receiving bribes, engaging in commercial bribery, or providing any other unlawful payments or benefits;
- shall promptly inform the Bank of any corruption risks or conflicts of interest associated with the performance of work or provision of services for the Bank.

21. The Bank shall include mandatory anti-corruption provisions (anti-corruption clauses) in agreements concluded with such persons, providing the Bank with the right to verify compliance with anti-corruption requirements and establishing grounds for unilateral termination of the agreement in the event of a breach of this Policy.

22. When establishing business relationships with such persons, the Bank shall conduct Due Diligence procedures in accordance with its internal procedures.

23. Where violations of the requirements of this Policy are identified, the Bank shall take appropriate measures, including termination of contractual relationships, and, where necessary, refer relevant materials and information to law enforcement authorities.

V. PROCEDURE FOR IDENTIFICATION, ASSESSMENT, AND MANAGEMENT OF CORRUPTION RISKS

24. The identification, assessment, and management of corruption risks constitute an integral part of the Bank's anti-corruption system.

25. The procedure for identifying, assessing, and classifying corruption risks by risk level, as well as measures for their mitigation and control, shall be governed by a separate internal document of the Bank, the "**Methodology for the Identification and Assessment of Corruption Risks**".

26. The Compliance Control Division shall conduct a corruption risk assessment at least once a year, both with respect to the Bank's activities as a whole and to individual areas of activity, and shall submit the results of such assessment to the Supervisory Board and the Management Board of the Bank.

27. Based on the results of the corruption risk assessment, the Bank shall develop and implement measures aimed at reducing such risks, including amendments to internal processes, procedures, and control mechanisms.

28. Heads of structural divisions shall participate in the process of identifying corruption risks within their respective divisions and shall ensure the implementation of measures for managing such risks.

VI. EMPLOYEE AWARENESS AND TRAINING

29. The Bank shall ensure systematic awareness-raising and continuous training of all employees on anti-corruption matters, the development of an anti-corruption culture, and compliance with the requirements of this Policy.

30. The Compliance Control Division, jointly with the Human Resources Department, shall annually develop and approve an anti-corruption training program for the Bank's employees, as well as for persons acting on behalf of and in the interests of the Bank (including agents, intermediaries, representatives, and other counterparties).

31. All employees of the Bank, including newly hired employees, shall complete introductory anti-corruption training within the first month of their employment.

32. Training activities shall be conducted on a regular basis, but not less than once a year. Additional training activities may be conducted in the event of significant amendments to legislation or the Bank's internal documents.

33. Responsibility for organizing and conducting employee training shall rest with the Human Resources Department and the Compliance Control Division.

34. Training formats may include:

- in-person and remote seminars, training sessions, and webinars;
- information bulletins, guidance materials, and awareness memoranda;
- testing of employees' knowledge of the key provisions of this Policy.

35. Heads of structural divisions shall ensure the participation of subordinate employees in mandatory training activities and shall monitor training results.

VII. GIFTS, ENTERTAINMENT, AND HOSPITALITY

36. Matters relating to the giving and receiving of gifts, as well as entertainment and hospitality expenses, shall be governed by a separate internal document of the Bank, the "Policy on Gifts, Entertainment, and Hospitality".

37. Employees of the Bank are prohibited from:

- giving or accepting gifts in the form of cash or cash equivalents (whether in cash or non-cash form);
- offering gifts to public officials or other persons, or accepting gifts from them, where such actions may be regarded as a corruption-related offense or may give rise to a conflict of interest.

38. All gifts and entertainment and hospitality expenses shall be reasonable, proportionate, transparent, and shall not expose the Bank to reputational risks.

VIII. PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST

39. Matters relating to the prevention and management of conflicts of interest shall be governed by a separate Conflict of Interest Policy.

40. All employees of the Bank, including members of its governing bodies, shall:

- timely disclose any actual, potential, or perceived conflict of interest;
- take measures to prevent conflicts of interest or to resolve them in accordance with the procedures established by this Policy.

41. Compliance with the requirements relating to the prevention and management of conflicts of interest shall be monitored by the Compliance Control Division and the Human Resources Department.

IX. REPORTING VIOLATIONS AND HANDLING REPORTS

42. Employees of the Bank shall immediately report any known facts or suspicions relating to corruption-related offenses, attempts to induce the commission of such offenses, or any other violations of the requirements of this Policy.

43. The procedures for submitting, receiving, registering, and reviewing reports of corruption-related offenses, as well as matters relating to the recognition and encouragement of employees for active participation in corruption prevention and anti-corruption activities, shall be governed by a separate internal document of the Bank, the “Regulation on the Submission, Receipt, and Review of Reports of Corruption-Related Offenses, and on the Recognition and Encouragement of Employees for Active Participation in Corruption Prevention and Anti-Corruption Activities”.

44. Reports may be submitted:

- to an immediate supervisor;
- to the Compliance Control Division;
- through the Bank’s whistleblowing hotline(s), either anonymously or with disclosure of the reporter’s identity.

45. The Bank shall receive and review anonymous reports. However, the Bank reserves the right not to provide a response regarding the outcome of the review of an anonymous report.

46. The Bank shall ensure the confidentiality of the information received and the protection of persons who report violations (including those who openly disclose such information) against any form of retaliation, discrimination, or other adverse consequences, in accordance with the legislation of the Republic of Uzbekistan.

X. INTERNAL INVESTIGATIONS AND CONTROL

47. All reports and facts relating to potential corruption-related offenses shall be subject to mandatory review and, where necessary, to an internal investigation.

48. The procedure for organizing, conducting, and documenting the results of internal investigations shall be governed by the Regulation on Internal Investigations and carried out in strict compliance with the requirements of the Labor Code of the Republic of Uzbekistan.

49. Internal investigations shall be conducted by a specially appointed commission. Where necessary, other structural divisions of the Bank may be involved in the investigation process.

50. Upon completion of an internal investigation, one of the following decisions shall be made:

- to close the investigation due to the absence of substantiation of the established facts;
- to apply disciplinary measures against employees found responsible;
- to refer the relevant materials to law enforcement authorities.

51. Employees of the Bank shall cooperate with internal investigations and, upon request of the commission or authorized persons, provide accurate information and all necessary data and materials.

XI. FINAL PROVISIONS

52. This Anti-Corruption Policy of Joint-Stock Company “ANOR BANK”, as well as any amendments and supplements thereto, shall be approved by a resolution of the Supervisory Board of the Bank.

53. In all matters not governed by this Policy, the Bank shall be guided by the legislation of the Republic of Uzbekistan.

54. In the event of any inconsistency between the provisions of this Policy and the legislation of the Republic of Uzbekistan or the Charter of the Bank, the provisions of the legislation and the Charter shall prevail. In such cases, the Bank shall make the necessary amendments to this Policy in accordance with Clause 52 hereof.

55. Amendments to this Policy shall be made in the event of changes in the legislation of the Republic of Uzbekistan, identification of ineffective provisions, or significant changes in the Bank’s business processes.

56. In the event of changes in the names of structural divisions and/or positions, as well as the redistribution of functions among divisions, activities under this Policy shall continue to be carried out by the relevant divisions and employees until the necessary amendments are made to this Policy.

57. This Policy shall be made publicly available on the Bank’s official corporate website. The Bank openly declares its rejection of corruption in all its forms, promotes compliance with the principles of this Policy by all employees, counterparties, and other persons, and contributes to enhancing anti-corruption awareness and culture within society.

58. As of the effective date of this Policy, the previously effective Anti-Corruption Policy of Joint-Stock Company “ANOR BANK”, approved by Minutes No. 7 of the Supervisory Board of the Bank dated February 25, 2021, shall cease to have effect.

Developed by:	Head of the Compliance Control Division	SIGNATURE	D. Khushnazarov
Approved by:	Chairman of the Management Board	SIGNATURE	Sh. Akramov
	First Deputy Chairman of the Management Board	SIGNATURE	E. Nadzhimitdinov
	Deputy Chairman of the Management Board	SIGNATURE	M. Nurutdinova
	Deputy Chairman of the Management Board	SIGNATURE	E. Kadirov
	Deputy Chairman of the Management Board	SIGNATURE	A. Saydullayev
	Deputy Chairman of the Management Board	SIGNATURE	S. Khan
	Deputy Chairman of the Management Board	SIGNATURE	M. Nuritdinova
	Deputy Chairman of the Management Board	SIGNATURE	M. Avazov
	Head of the Legal Department	SIGNATURE	T. Zanakhov
	Managing Director	SIGNATURE	A. Bakiyev
	Chief Accountant	SIGNATURE	U. Babayev
	Director of the Internal Audit Department	SIGNATURE	S. Usmanov
	Director of the Internal Control Department	SIGNATURE	M. Pulatova
Director of the Risk Management Department	SIGNATURE	D. Ibragimova	