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| **"APPROVED"**  **Decision of the meeting of Joint-Stock "BIOKIMYO"**  **Supervisory Board**  **N 2 on 23.08.2023 year.**  **Joint-Stock "BIOKIMYO"**  **ANTI-CORRUPTION POLICY**  Yangyol city |

1. **General rules.**
   * 1. JSC "BIOKIMYO" (hereinafter - society)strives to adhere to high standards of ethical and conscientious conduct in its business activities. ThisAnti-corruption policy(hereinafter referred to as "Policy") reflects the society's zero tolerance for corruption and defines the standards for the protection of the reputation and interests of the society's shareholders and stakeholders. The policy will come into force after approval by the Supervisory Board of the society.
2. **The purpose of the policy.**
   * 1. The purpose of this Policy is to clarify that corruption in any form and under any circumstances is prohibited. The policy defines the principles and rules that must be followed by all employees of the company and business partners specified in this policy, as well as the approaches to the implementation of these rules. In doing so, the Policy takes into account not only the interests of society, but also the expectations of its stakeholders, including, among others, employees, customers, shareholders, suppliers, business partners, local communities, and the interests of society as a whole.
3. **Application and scope.**
   * 1. 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.
     2. Society suppliers, contractors, agents, etc. interacts with various business partners such as The Society encourages its business partners to be aware of the Society's ethical standards. The Society makes every effort to encourage all business partners to adhere to the same ethical principles and calls on relevant business partners to take strict measures to combat corruption.
4. **Basic definitions of terms and basic rules.**
   * 1. **Bribery**(active bribery) is defined as the act of offering, giving, promising or permitting any kind of favor for oneself or others, directly or indirectly through third parties, in order to obtain or retain a business profit or other improper advantage in the conduct of business. Bribery (passive bribery) also refers to the act of asking or receiving any benefit for oneself or others, directly or through a third party, in order to perform or refuse to perform one's professional duties.
     2. **Corruption**means the illegal use of service or official powers by an individual for the purpose of personal interests or the interests of other persons, or the illegal giving of such benefits.
     3. Public officials are strictly prohibited from engaging in bribery and must not use intermediaries such as agents, consultants, distributors or other business partners to commit bribery activities. Public officials and other persons are not discriminated against in public bribery, and bribery cannot be allowed regardless of the status of the recipient.
     4. As a rule, the acceptance of gifts by employees, including personal benefits such as entertainment expenses, entertainment or travel, is permitted if such gifts are of modest value as defined in the company's Conflict of Interest Management Policy and Code of Ethics. The general rule when giving gifts, entertainment, entertainment or travel related gifts by employees to a customer, potential customer or customer or other business associate is that they should be modest, reasonable and few in number relative to any recipient. Gifts, hospitality and entertainment should never be promised to induce the recipient to do something for the community, to reward such behavior, or to refrain from any act detrimental to the community, should not be offered or provided. Employees should contact the Compliance Service in the community for advice and guidance on these matters. The Compliance Service maintains a record of requests for guidance and recommendations.
     5. **Gifts**defined as goods or services offered as a token of friendship or gratitude. A gift is given openly without expectation of reward or value in return. Gifts are usually given or received to initiate, strengthen or develop business relationships.
     6. Employees are prohibited from accepting gifts in the form of cash or financial incentives, such as loans or discounts, or more favorable terms in their personal relationship with any current or potential contractor, supplier or other counterparty of the Company.
     7. **Personal gain**means the following:

*-****Hospitality***includes meals, parties and other such activities. Hospitality differs from gifts in that hospitality requires the receiving party to be present;

-***Entertainment*** usually involves attending plays, concerts and sporting events;

-***Travel***is defined as the provision of a travel ticket, accommodation or reimbursement of the cost of travel or accommodation by a potential customer, customer or business partner of the company.

* + 1. The Society does not pay for the travel, accommodation and related expenses of other persons, except for the cases expressly provided for in the contract.
    2. ***Political contributions***- this is cash, material gifts, intangible goods or services donated or provided to a political party, politician or political candidate. Such contributions may be used to improperly influence political processes or decisions to gain illegal influence. The Society does not allow direct or indirect political contributions under any circumstances.
    3. ***Charity***can be given in cash or in kind and includes any valuables that the community donates to support charitable activities in culture, education, science, social welfare and other areas. A charitable donation is a voluntary donation that helps a non-profit organization achieve its goals or cover its expenses and does not represent a significant commercial benefit to the donor.
    4. The Society distinguishes two categories of donations:

**- one-time financial assistance**, which is a donation of money to a particular body for the general achievement of its purpose;

**- financial participation or a specific event**, grants representing full reimbursement of costs for actions or projects of a permanent nature.

Instead of financial support, the society can provide donations related to the provision of goods (tangible or intangible) or services in a non-monetary form to a third party.

Other donations include social projects in which the community develops its primary production activities and is financed by the community or created by the community and entirely related to local communities.

* + 1. ***Sponsorship***- holding an event, providing services or carrying out activities that give rights and privileges to society. For example, transferring funds to a third party for the purpose of promoting and advertising community services.

Cultural patronage means certain cultural events intended to promote society through cooperation with certain institutions and events related to culture. Sponsorships differ from donations in that the sponsor receives something in return, such as advertising or promotion of the community.

* + 1. As a rule, donations and sponsorships are provided in accordance with applicable law and must never be directly or indirectly related to illegal activities or illegal benefits for society.
    2. Donations and sponsorships can be considered bribes if they are given or received as a reward for coercing someone to do something wrong or as a reward for doing something wrong. They can also be used as hidden transfers to corrupt counterparties.

1. **Policy implementation.**
   * 1. The Compliance Department undertakes ongoing training and awareness of community staff to ensure effective implementation of the Policy. In particular, the Compliance Service, in cooperation with the HR Service, takes the following measures related to employee training:

- to provide the necessary information, including the publication of this Policy, through the Internet, internal seminars, open discussions, etc., to ensure the awareness of employees about the prevention of corruption;

- when recruiting new employees, introduces them to the society's anti-bribery and anti-corruption rules.

* + 1. The Community Compliance Service is responsible for ensuring compliance with this Policy. The Compliance Service is responsible for ensuring that the Policy is up-to-date and demonstrating best practices.
    2. Each manager must comply with this Policy within the scope of his/her functional responsibility, set an example (be a role model) and give instructions to subordinates.
    3. All employees are responsible for following the principles and rules set forth in this Policy. Reports of violations of the Policy by employees, violations identified by the Compliance Service on its own initiative, or suspected violations must be processed in the prescribed manner.

1. **Oversight of anti-corruption policies.**
   * 1. The Compliance Service reviews the Policy at least once every two years or periodically as necessary to determine the necessary changes and additions to the goals of the Policy, as well as to ensure compliance with applicable laws and internal policies and procedures of the company.
     2. Any changes to the policy will be approved by the Supervisory Board on the recommendation of the Anti-Corruption and Ethics Committee established under the Supervisory Board of the company.

**The head of the compliance Z.V. Ungarbaeva**