



BEYIK YUPEK YOLY



**APPROVE**  
**Director of the**  
**IE "Beyik yupek yoly"**

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**ANTI-BRIBERY POLICY**  
**of the Individual Enterprise**  
**"Beyik yupek yoly"**  
**ISM.BYY.01. П.06.01.**

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**Anti-bribery policy  
of the Individual Enterprise "Beyik yupek yoly"**

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**Document validity  
period**

from 03 01 2025

till 03 01 2028

**Revised:  
Validity period  
extended till**

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## **Anti-bribery policy of the Individual Enterprise "Beyik yupek yoly"**

The purpose of the anti-bribery policy (hereinafter referred to as the Policy) is to inform the employees of the Individual Enterprise "Beyik yupek yoly" (hereinafter referred to as the Enterprise) regarding the legislation of Turkmenistan in the field of combating bribery, rules and regulations, as well as the necessary measures and mechanisms of influence aimed at preventing violations, regulatory requirements that are applicable at the Enterprise.

This Policy is brought to the notice of all employees of the Enterprise. All newly hired Employees must be informed of the Policy at the time of employment, concluding an employment or similar agreement with the Enterprise. Having read and understood this Policy, the Employee shall be deemed to confirm that he/she has read, understood and undertakes to comply with the Policy.

### **PROHIBITION OF BRIBERY**

The Enterprise prohibits any actions specified in the legislation on bribery as prohibited activities, and also insists and expects from each Employee to keep from gifting, promising, offering, accepting, or permitting a Bribe or any payment in the form of anything of value to any person for the benefit of, or from any government official, committed in violation of applicable laws of Turkmenistan in order to obtain or retain business opportunities or provide some other illegal or unauthorized advantages. In Fact, these rules prohibit giving anything of value with the aim of influencing the actions of a government official, as well as other participants in business processes. Prohibited actions include, but are not limited to, actions aimed at:

- Inducing the recipient to conclude a contract, issue a license, or to solve an issue in favor of the Enterprise or its partners;
- Obtaining the most favorable tax or customs regime; or
- bending the laws or regulations applicable to the Enterprise or its partners, or inducing them not to comply with laws or regulations.

The prohibition on Bribetaking applies when offering or giving money or other valuables, even if the benefit from this is not received by the party making the payment, but by another person.

In fact, even standard business practices or social events, such as giving business gifts and holding receptions, due to some circumstances, may be a Bribe if this was done in violation of the anti-bribery legislation of Turkmenistan. Therefore, offering or accepting gifts for corrupt purposes is strictly prohibited (except for Donations and Sponsorships). Under no circumstances or for any reason should employees of the Enterprise offer or accept any gifts in the form of money in any currency, money equivalents, or securities.





Employees of the Enterprise shall be obligated to comply with the applicable legislation of Turkmenistan, which prevents illegal activities through offering bribe to officials which prohibit any transactions with funds or other property obtained illegally. If an employee of the Enterprise has any questions regarding the legislation or has an information indicating that any of the Employees of the Enterprise is involved in such illegal activity, this Employee shall immediately report about it using one of the following methods:

- by addressing (in writing or orally) their immediate supervisor;
- by filling out the notification card;
- by sending an email to [info@gsr.tm](mailto:info@gsr.tm).

#### FINAL PROVISIONS

The Enterprise openly declares its rejection of corruption, encourages and supports compliance with the principles and requirements of the Policy by all partners and Employees.

This Policy is subject to direct implementation and application in the activities of the Enterprise, is noticed to all employees, and is freely available on the official website of the Enterprise in the Internet.

To implement strategic directions in controlling bribery, the Management of the Enterprise undertakes the following commitments:

- to prohibit bribery;
- to provide a foundation for setting, analyzing, and achieving anti-bribery goals;
- to conduct continuous monitoring and analysis of information regarding the requirements of parties concerned;
- to explain powers and independence of the person responsible for ensuring legal compliance in anti-bribery;
- to explain the consequences of non-compliance with the Policy;
- to support and improve the anti-bribery management system;
- to increase Employee productivity by optimizing working hours and improving workplace equipment;
- to provide the necessary conditions for creative approaches and enhance each employee's responsibility for the quality of their work, in order to meet the requirements and expectations of parties concerned, including those related to the bribery control matters;
- to continuously improve employee qualifications through specialized training and certification.

The Management of the Enterprise guarantees to provide necessary resources for the implementation of Anti-bribery Policy, as well as ensuring the continuous improvement of the effectiveness of the Bribery Control system.

In the event of changes in the legislation of Turkmenistan, the Management of the Enterprise will organize activities to update the provisions of this Policy of the Enterprise.

## AMENDMENT HISTORY

[illegible]