



BEYIK YUPEK YOLY



APPROVE
Director of the
IE «Beyik yupek yoly»

M. Bekmuradov

« 06 » 01 2024



ANTI-CORRUPTION POLICY

of the Individual Enterprise

«Beyik yupek yoly»

ISM.BYY.01.П.02.03.

The document is the property of the IE "Beyik yupek yoly" and is confidential. Contents of this document may not be reproduced in whole or in part, or transferred to third parties who are not employees of the enterprise, without prior approval with the Quality and Ecology Manager. Any changes are made to the original and only into controlled copies of this document.



ANTI-CORRUPTION POLICY
of the Individual Enterprise «Beyik yupek yoly»

	Position	Full Name	Date	Signature
Developed by:	Quality and Ecology Manager /Lawyer	Rozyyev O.	02.01.2024	
Agreed by:	Deputy Director	Gorshkov V.	02.01.2024	
	Chief lawyer	Sadyhyan V.	02.01.2024	
	Chief Accountant	Shapovalova V.	02.01.2024	
	Head of Analysis and Procurement Department	Ilkayeva Z.	02.01.2024	
	Head of Railway Department	Bebilova M.	02.01.24	
	Head of General and Bulk Cargo Department	Abdullayeva I.	02.01.24	
	Head of Industrial Projects Department	Massalskaya T.	02.01.2024	
	Deputy Head of Industrial Projects Department	Babayan Sh.	02.01.2024	
	Head of administrative and supply department	Talibova N.	02.01.24	
	Head of airfreight and express delivery services department	Hojamamedova M.	02.01.24	
	Head of Autoservice Division	Nikiforenko D.	02.01.24	
	HSE Engineer	Ovezov M.	02.01.24	
	HSE Engineer	Kulmanov S.	02.01.24	
	Head of HR division	Velliatayeva J.	02.01.24	

Document validity period:

from 02.01.24 till 31.12.26

Revised:

Validity period extended till:



ANTI-CORRUPTION POLICY OF THE INDIVIDUAL ENTERPRISE «BEYIK YUPEK YOLY»

Employees of the "Individual Enterprise "Beyik yupek yoly" (hereinafter referred to as the Enterprise) are obliged to comply with the legislation of Turkmenistan, as well as policies, rules, and regulations of the Enterprise. Employees of the Enterprise shall not take part in actions or encourage others to take part in any actions of his/her coworkers which violate the Legislation of Turkmenistan as well as policies and regulations valid in the Enterprise.

Legislative regulations, includes, but is not limited to laws on: giving/accepting bribes, commercial bribery, copyrights, trademarks and commercial secrets, information security, confidential personal data, transactions using insider information, anticorruption management, giving or accepting monetary remunerations, harmful environmental impacts, employment discrimination or harassment, safety and work conditions, false or distorted financial information, and improper use of corporate property.

ILLEGALL LEGITIMIZATION OF INCOME

Employees of the Enterprise shall comply with the current legislation of Turkmenistan which prevents the legitimization of illegally obtained income, and prohibits any transactions with funds or other property obtained illegally. Should an Employee of the Enterprise have any questions with the legislation or an information indicating that any of your Employees of the Enterprise are involved in such illegal activities, that employee must immediately report it using one of the following methods:

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

ANTI-CORRUPTION LEGISLATION

Corruption, as defined in this Anti-Corruption Policy (hereinafter referred to as the "Policy"), means abuse of official position, giving bribe, accepting bribe, abuse of power, commercial bribery, or any other illegal use by an individual of his/her official position which goes against the legitimate interests of society and the state in order to obtain benefits in the form of money, valuables, other property, or monetized services, other property rights for themselves or for third parties, or the illegal provision of such benefits to the indicated person by other individuals.

An atmosphere of intolerance toward corrupted conduct is created and maintained within the Enterprise.

The employees of the Enterprise comply with the requirements and restrictions established in accordance with anti-corruption legislation both within Turkmenistan and abroad.





Any forms of unlawful influence on the decisions of state bodies, including bribery, offering unacceptable gifts, getting employed the relatives of government officials, charitable or sponsorship assistance at the request of government officials of relevant state authorities (decision-making bodies in which the Enterprise is interested) are not accepted in the Enterprise.

Employees must notify their immediate department manager and/or quality and environmental manager and/or by email to info@gsr.net if they have been approached by any persons with the purpose to induce them to commit corruption offenses.

GIFTS OR OTHER BENEFITS

A gift is recognized as any value received because the Employee works at the Enterprise, in tangible or intangible form for which there is no obligation to pay the usual price including money, securities, and other property, as well as benefits and monetized services (such as work, services, payment for entertainment, leisure, transport expenses, loans, discounts, provision of property for use, including housing, charitable contributions, etc.).

Receiving a gift by an employee may be negatively assessed by other employees or other persons (including partners, contractors, the state and government authorities, other market participants), even if there is no bad faith or unreasonableness in the intentions of the employee and the donator.

Gifts to family members, relatives, or other closely-known persons of the Employee of the Enterprise for the purposes of this Policy are considered as gifts to the Employee.

The company restricts the possibility of accepting gifts.

The Employees of the Enterprise are not allowed to accept gifts from any third parties in any of the following situations:

- for performing any actions (inactions) related to the work at the Enterprise;
- with a value exceeding 500 (five hundred) manats;
- in the form of cash or cash equivalents;
- in the absence of obvious, commonly accepted reason for the gift.

Restrictions to accept gifts established by the Policy shall not apply to the Employee's obvious family relationship with the donator (such as gifts from parents, children, or spouses) or other close personal relationships that exist independently from the Employee's work at the Enterprise as well as in cases when such gifts are corporate souvenir items such as pens, notebooks, diaries, etc.

Any unauthorized gifts shall be declined. If good business practices do not allow the refusal of a gift, then a gift is subject to acceptance and at the same time the question of further fate of the gift is transferred to the decision of the person who is authorized to consider issues of ethical conduct at the Enterprise or the Head of the Enterprise, or to the mail info@gsr.net

If there are any doubts regarding the acceptability of a gift or any other issues regarding the procedure for handling gifts, the Employee of the Enterprise should address for clarification to his/her direct Department Manager or the Enterprise Quality and Ecology Manager.



CONFLICT OF INTEREST

Conflict of Interest is a situation when the personal interest of an employee affects or may affect the employee's ability to perform his job duties objectively and impartially, and where discrepancies arise or may arise between the personal interest of an employee and the legitimate interests of the Enterprise, which may cause harm to the legitimate interests of the Enterprise.

The presence of a conflict of interest (or the seeming presence of such a conflict) represents a threat to the reputation of the Enterprise in the opinion of employees, the Society, and other parties (including shareholders, contractors, the state and government bodies, trade unions, professional associations, and participants of the securities market).

Employees of the Enterprise shall avoid situations where they may have a conflict of interest. In the event of a conflict of interest, Employees should inform their direct supervisor or the Enterprise Quality and Ecology Manager.

In the event of a conflict of interest involving the sole executive body of the Enterprise, the latter shall inform the authorized person responsible for corporate ethics at the Enterprise or the Head of the Enterprise, or send a message to info@gsr.net

In the event of a conflict of interest of the sole executive body of an organization controlled by the Enterprise, the latter shall inform the authorized person responsible for corporate ethics at the Enterprise or the Head of the Enterprise, or send a message to info@gsr.net

A transaction involving an interest does not constitute a conflict of interest if it has been duly approved by the Enterprise management bodies as a transaction in which the employee of the Enterprise is interested.

In situations with a conflict of interest between the employee and the Enterprise, if it is impossible to eliminate the conflict, the interests of the Company shall prevail.

EMPLOYEES OF THE COMPANY ARE PROHIBITED TO:

1. Give or accept bribes (monetary or other benefits);
2. Demand, transfer or accept bribes (monetary or other benefits);
3. Commit actions that may be considered as bribery to officials;
4. Engage third parties in order to bypass anti-corruption requirements of the Policy.
5. Have personal interest in the activities of the business partners of the Enterprise, if such interest contradicts the interests of the Enterprise.
6. Be engaged in additional nonspecialized work or other activities during working hours, if due to such activity the employee negatively performs his/her job responsibilities at the Enterprise.



7. Accept credits, services, gifts in amount of more than 500 (five hundred) manat from any individuals or legal entities having business relations with the Enterprise or those who strive for such relationships (this does not apply to organizations offering such credits or services in the course of ordinary activities).
8. Hide the fact of conflict of interest and its causes.
9. Travel, participate in various events (seminars, conferences, etc.) transportation or accommodation expenses shall be paid by individuals or legal entities having business relations with the Enterprise or seeking to establish such relations, unless such travel is approved by the managers of the Enterprise and is related to training or gaining experience necessary for business operations. All travel expenses for such trips shall be paid by the Enterprise in accordance with applicable law or at market prices, except for the above trips agreed with the Management of the Enterprise.

FINAL PROVISIONS

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

The Anti-Corruption Policy is subject to direct implementation and application in the Enterprise activities, is noticed to all Employees, and is freely available on the official website of the Enterprise in the Internet.

Responsibility for organizing work to implement the requirements and provisions of the Policy is assigned to the Heads of Departments and the Quality and Ecology Manager.

Based on incoming requests Heads of Department and the Quality and Ecology Manager take decisions aimed at:

- explaining to the Employee the provisions of the Policy and the procedure for its application;
- taking measures to prevent or resolve a conflict of interest. If it is not possible to resolve the conflict of interest, Heads of Department or the Quality and Ecology Manager take actions aimed at limiting the conflict of interest and/or its consequences, including to ensure that the interests of the Enterprise are respected in the situation of such a conflict:

The Head of Department and the Quality and Ecology Manager can be contacted via:

- Email (info@gsr.net) or a personal message via the internal corporate messenger - Bitrix24;
- through a notification card;
- by the personal mobile phone number.

A decision on each incident can be made collectively or individually, in person or in absentia. Decisions are made in writing in the text of the minutes by the commission or orally by fact.



Employees must contact their immediate supervisor or the Quality and Environment Manager in the event of a conflict of interest unless otherwise expressly provided by this Code.

If an immediate supervisor fails to take measures to prevent or resolve the conflict of interest, or if the measures taken do not resolve the conflict, an Employee shall inform the Head of the Enterprise.

The Enterprise is open to discuss practical applications of the provisions of the Policy. The Anti-Corruption Policy declares measures aimed at preventing and fighting corruption within the Enterprise.

If the Policy or any of its provisions conflict with the legislation of Turkmenistan, the Policy or its specific provisions shall become invalid, and until changes are made to the Policy, it is necessary to be guided by the current legislation of Turkmenistan.

In the event of changes to the legislation of Turkmenistan, the Enterprise Management shall take steps to update the provisions of the Enterprise Anti-Corruption Policy.

AMENDMENT HISTORY

[illegible]