



«APPROVED»

By Supervisory Board
JSCMB "Ipoteka-bank"
(meeting protocol #34 dd. July 29, 2022)



REGULATION
ON COMPLIANCE CONTROL DEPARTMENT
JSCMB "IPOTEKA-BANK"

Tashkent - 2022

Confidentiality

All information contained in this document shall be considered confidential and is the property of JSCB "Ipoteka-bank". Disclosure of this document is full or in part, as well as its annexes by employees of JSCB "Ipoteka-bank" to a third party is possible only with the permission of Compliance Control Department of JSCB "Ipoteka-bank".

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 1</i>

CONTENTS

1. Abbreviations and definitions 3

2. General provisions..... 6

3. Scope of the Regulation 6

4. Main regulatory documents..... 6

5. Purpose of the Regulation 7

6. Aims of compliance control 7

7. Tasks and functions of compliance control 7

8. Authority and rights of CCD 10

9. Obligations and responsibilities of CCD 11

10. Principles of CCD activities 13

11. Organization of CCD activities 14

12. Requirements for CCD employees 15

13. Process of providing consulting service 15

14. CCD accountability 17

15. Procedure of keeping CCD documents 18

16. Relationship with the Management and other units of the Bank..... 19

17. Relationship with CBU and authorized government bodies of the Republic of Uzbekistan..... 20

18. Assessment of CCD's performance 20

19. Final provisions 20

Appendix 1. 22

Appendix 2. 24

Appendix 3. 25

Appendix 4. 26

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
IND: PL-22-18-05	Version #:2.1	Effective Date: 01.08.2022y.	Page No: 2

DOCUMENT REVISION CHRONOLOGY

Name of document:		Regulation on Compliance control department	
	Management body	Date	
Approved by:	Supervisory board of JSCMB "Ipoteka-bank"	30.08.2021	
Recommended by:	Audit, Anti-Corruption and Ethics Committee	14.08.2021	
Prepared by:		Date:	Signature:
Compliance control department		July 2021	
Agreed with:			
Legal department		July 2021	
Audit, Anti-Corruption and Ethics Committee		July 2021	
Version number	Release date	Effective date	Brief description of the changes
1.0	26.07.2021 г.	01.08.2021 г.	Regulation was worked out.
2.0	30.08.2021г.	30.08.2021 г.	This Regulation was developed in a new version in accordance with the transfer of CCD to the subordination of SB, in order to ensure compliance with the requirements of the Central bank for compliance and internal control, recommendations of the Basel Committee on banking supervision.
2.1	28.07.2022 г.	01.08.2022 г.	Additional definitions have been introduced (IRD, interested parties, structural units of the Bank), Regulation has also been revised in accordance with the decision of Supervisory board #14 dd. April 28, 2022 on the providing the function on combating the legalization of income derived from criminal activity, the financing of terrorism and the proliferation of weapons of mass destruction to the direct supervision of the Chairman of Management board

DOCUMENT ACCESS CONTROL

Control and storage of the document is carried out according to the list indicated in the table below:

Document number	Document holder (Position)	Document Format
1	Corporate consultant service	Original in PDF
2	Compliance control department	Original in Word
3	Electronic library of internal regulatory documents of the Bank	Copy in PDF

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
IND: PL-22-18-05	Version #:2.1	Effective Date: 01.08.2022y.	Page No: 3

1. Abbreviations and definitions

#	Abbreviations	Definitions
1	Agency	Anti-corruption agency of the Republic of Uzbekistan
2	JSCMB "Ipoteka-bank» / Bank	Joint-stock commercial mortgage bank "Ipoteka-bank"
3	budget of CCD	financial plan of expenses of CCD, which is agreed with Committee, approved by Supervisory board for the year and includes expenses for salaries and remuneration of employees of CCD, business trip expenses, training expenses, as well as for the purchase of fixed assets necessary for the effective performance of CCD tasks. The budget of CCD is prepared once a year, and all approvals and consents must be received by the end of October in order to include the CCD budget in the Bank's annual budget in a timely manner
4	IRD	a reusable internal regulatory document developed and approved by the relevant management body of the Bank and intended to regulate the internal activities of the Bank
5	IAD	Internal audit department of JSMB "Ipoteka-bank"
6	ICD	Internal control department of JSMB "Ipoteka-bank"
7	subsidiary	business company or partnership, where the Bank by virtue of the prevailing participation in its authorized capital or in accordance with the agreement concluded between them or otherwise has the ability to determine the decisions made by such company
8	CCD	Compliance control department of JSCMB "Ipoteka-bank"
9	BRMD	Bank risk management department of JSCMB "Ipoteka-bank"
10	interested persons	shareholders of the Bank, members of Supervisory board of the Bank, members of the Management board of the Bank, investors, customers, analysts, government agencies, professional participants of securities market, employees of the Bank, mass media and other consumers of information about the Bank
11	customer of CCD	for the purposes of this Regulation, customer of CCD means Supervisory board, Management board, structural units of the Bank and its employees
12	Committee	Audit, anti-corruption and ethics Committee under Supervisory board of JSCMB "Ipoteka-bank"

#	Abbreviations	Definitions
13	compliance laws, rules, standards / CLRS	compliance laws, rules and standards, which include all laws, regulations and standards adopted by legislative and supervisory authorities of the Republic of Uzbekistan, market conventions and other rules adopted by industry associations, as well as the Bank's internal regulations that cover such issues as compliance with appropriate standards of market conduct, management of conflict of interest, protection of rights of consumers and employees of the Bank, compliance with the tax regime, the requirements of accounting, reporting and disclosure of information, etc.
14	compliance control	compliance control function includes preventive monitoring of the Bank's operations for compliance with CLRS, combatting corruption and fraud prevention, as well as in terms of protection of rights of consumers and employees of the Bank and compliance with the code of business conduct and the corporate ethics of the Bank
15	compliance risk	risk of sanctions, significant financial losses or damage to the bank's reputation as a result of non-compliance or improper execution of established rules of compliance or controls aimed at compliance with CLRS
16	CCD consulting services	advisory services of CCD include providing advice and recommendations to SB, Management Board, and structural units of the Bank regarding the Bank's activities in terms of compliance with the laws of RU and IRD regulating compliance and compliance control, combatting corruption and fraud prevention, protection of rights of consumers and employees of the Bank, and compliance with the code of business conduct and corporate ethics of the Bank
17	SB	Supervisory board of JSCMB "Ipoteka-bank".
18	Management board	executive body of the bank, the whose work is regulated by the Charter of the Bank, the Regulation on the Management board of the Bank and other internal regulative documents of the Bank.
19	RU	Republic of Uzbekistan
20	Bank's Management	Supervisory board and Management board of JSCMB "Ipoteka-bank"

#	Abbreviations	Definitions
21	compliance control system	the totality of all procedures, methods and measures established by Supervisory Board and Management Board of the Bank to ensure proper compliance with CLRS
22	structural units of the Bank	Department, division, unit, branch of the Bank
23	CBU	Central Bank of the Republic of Uzbekistan

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 6</i>

2. General provisions

2.1. This Regulation regulate the procedure for organization and activities of CCD at the Bank, its tasks and functions, implementation of the Compliance Policy, the procedure for cooperation of CCD with SB, Committee, Management board and structural units of the Bank when performing the compliance control functions.

2.2. CCD was established with the decision of SB and is a structural unit performing the functions of compliance control at the Bank and subordinate to SB through Committee.

2.3. For the objective performance of its duties, CCD must be independent from the executive and business functions of the Bank.

2.4. The main provisions stipulated in this Regulation provide CCD with the ability to perform the functions of compliance control objectively and independently, determine the rights and obligations of employees of CCD, as well as the procedure for implementation of compliance control, taking into account the assessment of compliance risks in the Bank's activities.

2.5. CCD performs the function of compliance control by carrying out preventive monitoring of the Bank's operations for compliance with CLRS, the Code of business conduct and corporate ethics, combating corruption and prevention of fraud, monitoring and consideration of complaints and appeals from customers, employees of the Bank and third parties in terms of violation of their rights.

3. Scope of the Regulation

3.1. SB, the Management board of the Bank, CCD, all structural units and employees of the Bank

4. Main regulatory documents

4.1. The Law of the Republic of Uzbekistan "On banks and banking activities";

4.2. Regulation on corporate governance in commercial banks;

4.3. Code of corporate governance of JSCMB "Ipoteka-bank";

4.4. Regulations on Supervisory board of JSCMB "Ipoteka-bank";

4.5. Regulations on Audit, Anti-Corruption and Ethics Committee under the Supervisory board of JSCMB "Ipoteka-bank";

4.6. International standards on compliance and compliance functions at banks, recommended by the Basel Committee on Banking supervision;

4.7. Law of the Republic of Uzbekistan "On combating corruption";

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 7</i>

4.8. Decree of the President of the Republic of Uzbekistan #5177 of July 6, 2021 "On additional measures for the effective organization of anti-corruption activities";

4.9. Law of the Republic of Uzbekistan "On guarantees and freedom of access to information";

4.10. Compliance Policy of JSCMB "Ipoteka-bank";

4.11. Anti-corruption Policy of JSCMB "Ipoteka-bank";

4.12. Anti-fraud Policy of JSCMB "Ipoteka-bank";

4.13. Whistleblowing Policy of JSCMB "Ipoteka-bank";

4.14. Policy on prevention and elimination of conflicts of interest of JSCMB "Ipoteka-bank";

4.15. Personal data protection Policy of JSCMB "Ipoteka-bank".

5. Purpose of the Regulation

5.1. The purpose of the Regulation is to regulate issues such as status, goals, scope of activity, principles, rights, responsibility and obligation of CCD, organization of the compliance control at the Bank, compliance control procedures and requirements for them, accountability of the compliance control function.

6. Aims of compliance control

6.1. The main aims of compliance control are:

6.1.1. preventing the realization of compliance risks;

6.1.2. determination of compliance risks, identification of levels of compliance risks, their assessment, documentation, mitigation and monitoring;

6.1.3. combating corruption and preventing fraud;

6.1.4. ensuring the observance and protection of the rights of the Bank's customers, employees and third parties in terms of CLRS and compliance with the Code of business conduct and corporate ethics.

7. Tasks and functions of compliance control

7.1. The main tasks of compliance control are:

7.1.1. analyze of compliance risks, their assessment, measurement and monitoring;

7.1.2. identification of new compliance risks, development of measures to mitigate them and implementation of necessary controls;

7.1.3. analyze, assessment and improvement of efficiency of compliance control;

7.1.4. prevention of possible financial and reputational losses of the bank as a result of non-compliance with CLRS;

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 8</i>

7.1.5. development and submission of proposals to Committee on amendments to the Bank's Compliance Policy in accordance with changes in the activities of the Bank and CLRS;

7.1.6. development and implementation of measures to prevent conflicts of interest, resolve conflicts of interest, control over compliance with Policy on prevention and elimination of conflicts of interest;

7.1.7. development and implementation of measures on combating corruption and prevention of fraud;

7.1.8. development and implementation of measures on observing and protecting of the rights of the Bank's customers, its employees and third parties;

7.1.9. providing to SB with reliable and independent information about the real state of the Bank and the effectiveness of compliance control system;

7.1.10. control over the timely elimination of violations and shortcomings in the Bank's activities, revealed by the results of IAD, CBU and authorized government bodies of the Republic of Uzbekistan on facts of corruption and/or fraud, violation of the rights of the Bank's customers, employees and third parties and measures being taken to prevent their recurrence in the future;

7.1.11. providing assistance to the employees of CBU and authorized government bodies, IAD and BRMD through the exchange and provision of information in the course of inspections carried out by them;

7.1.12. providing professional advice to structural units and employees of the Bank on the implementation of the legislation of the Republic of Uzbekistan and internal regulatory documents of the Bank in terms of compliance risks, compliance controls, on combating corruption and fraud, observance and protection of the rights of the Bank's customers, employees and third parties;

7.1.13. control over the timely introduction of changes in IRD of the Bank in accordance with changes in the legislation of the Republic of Uzbekistan, business processes and product lines of the Bank.

7.2. The main functions of compliance control are:

7.2.1. development and implementation of measures on combat corruption and fraud, assessment of corruption and fraud risks, development of a map of corruption and fraud risks;

7.2.2. development and implementation of measures on controlling the use of insider information;

7.2.3. development and implementation of measures on identification, prevention and elimination of conflicts of interest;

7.2.4. ensuring compliance with IRD in order to mitigate compliance risks, implement measures on combating corruption;

7.2.5. taking measures provided for by the legislation of the Republic of Uzbekistan and the Bank's IRD in order to prevent the risk of using banking services when committing offenses related to compliance risks in the Bank, including in order to prevent committing offenses;

7.2.6. identification, measurement, assessment of compliance risks, development of compliance risk map;

7.2.7. providing the results of the compliance risk assessment to CBU, the Management board, Committee and SB;

7.2.8. control over timely elimination of errors and shortcomings in the Bank's activities identified during inspections conducted by authorized representatives of CBU, employees of IAD, external auditors and employees of specially authorized government bodies;

7.2.9. conducting an annual analysis of the compliance of the activities of the structural units of the Bank with the job descriptions in order to assess compliance risks, risks of corruption, crimes and fraud, violations of principles of conducting business and corporate ethics, violations of CLRS;

7.2.10. formation of a database on the facts of realization of compliance risks, including violations of CLRS, facts of corruption, fraud, violations of the rights of the Bank's customers, employees and third parties, as well as fines, penalties and other sanctions imposed and/or collected from the Bank in connection with realization of these risks;

7.2.11. exchange of information with IAD and BRMD, including information from the database, as specified in article #7.2.10 of this Regulation;

7.2.12. analysis of compliance risks that led to damage to the Bank's reputation, imposition of sanctions by CBU and other authorized government bodies of the Republic of Uzbekistan;

7.2.13. development and maintenance of a reporting system on compliance risks and disclosure of information on compliance risks to SB, Committee and the Management board of the Bank;

7.2.14. effective cooperation with all structural units of the Bank, and especially with Legal department, IAD and BRMD on compliance risk management, including identification, assessment, analysis, monitoring of compliance risks, as well as implementation of measures on their prevention and control mechanisms of compliance risks;

7.2.15. cooperation with CBU and authorized government agency on the organization of compliance control system at the Bank, prevention and elimination of violations of CLRS;

7.2.16. organizing and conducting trainings for the employees of the Bank on the application of the legislation of the Republic of Uzbekistan and internal regulatory documents of the Bank in terms of compliance risks, compliance controls, combating corruption and prevention of fraud, observation and protection of the rights of the Bank's customers, employees and third parties, execution of the provisions of Policy on prevention and elimination of conflicts of interest;

7.2.17. taking measures on identification, assessment, prevention and controlling of conflicts of interest;

7.2.18. timely consideration of complaints and information about the cases and risks of prohibited operations at the Bank, including cases of fraud and corruption from the side of the Bank's employees and third parties, as well as their illegal actions, and taking measures on elimination of the revealed facts of violations;

7.2.19. conducting inspections and investigations on the received information on the facts of illegal or unethical actions in the activities of the Bank, about the participation or suspicion of participation of the Bank, its employees, at any prohibited practices, misconduct, violations of business ethics and rules of conduct for employees;

7.2.20. development and submission of recommendations to the Committee on the existing rules, standards and practices being applied by other international organizations in the organization and realization of compliance control;

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 10</i>

- 7.2.21. fulfillment of tasks on checking certain issues at the request of CBU, participation at the inspections of CBU and law enforcement agencies of the Republic of Uzbekistan;
- 7.2.22. development and preparation of recommendations and comments on IRD of the Bank in order to mitigate the compliance risks;
- 7.2.23. development of relevant internal regulative documents on the management of compliance risks.

7.3. The details of compliance control functions within the units of CCD are reflected in Appendix #4 to this Regulation.

8. Authority and rights of CCD

8.1. CCD should function independently from the Bank's business activities within the framework of its competencies.

8.2. CCD employees have the following authorities:

- 8.2.1. to request documents from the managers and employees of the Bank, branches and representative offices of the Bank in the Republic of Uzbekistan and abroad, subsidiaries, employees of payment agents and payment subagents, which are necessary in the course of the performance of duties of CCD;
- 8.2.2. to access to the premises of structural units of the Bank, as well as access to premises for storing documents (archives), processing computer data and storing data in electronic form with the written permission of the Chairman of the Management board;
- 8.2.3. to receive clarifications (including in written form) from the managers and employees of the Bank on issues arising in the course of performing the compliance control functions, as well as, if necessary, receive clarifications on interested issues;
- 8.2.4. to receive and make copies from received documents, receive copies of files and other records stored in the bank's electronic databases, local networks and autonomous computer systems;
- 8.2.5. to withdraw the original documents in accordance with the established procedure (if there is a suspicion of safety) in case of necessity;
- 8.2.6. to control over the implementation of measures on elimination of deficiencies and violations identified as a result of compliance control;
- 8.2.7. to ask support from specialists of other structural units of the Bank.

8.3. CCD employees have the opportunity to refuse to an assignment on providing consulting services if they do not have sufficient knowledge, skills and other competencies to perform it and/or providing advice will lead to a conflict of interest.

8.4. Head of CCD has the right:

- 8.4.1. initiate an extraordinary meeting of Committee;
- 8.4.2. participate at meetings of SB, Management board, Committee and other committees without voting right.

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 11</i>

8.5. The professional competence of CCD employees should be maintained through their systematic and continuous training. CCD employees have right to receive additional training in order to acquire the necessary skills and qualifications on compliance control, combating corruption and fraud, observing the rights of the Bank's customers, employees and third parties. At the same time, the plan, scope and types of training are determined annually by Head of CCD based on the results of an assessment of the activities of CCD employees and approved by Committee.

9. Obligations and responsibilities of CCD

9.1. The main obligations of Head of CCD include:

- 9.1.1. development of IRD of the Bank in accordance with CLRS in terms of compliance, compliance control and this Regulation, and also job responsibilities for the employees of CCD;
- 9.1.2. ensuring that the employees of CCD are conducting their job responsibilities, IRD regulating CCD's activities;
- 9.1.3. selection of qualified CCD staff and management of his/her work, organization of professional development of CCD staff;
- 9.1.4. timely reporting of CCD to Committee and SB in accordance with the Regulation on Audit, Anti-Corruption and Ethics Committee under SB, this Regulation and other relevant IRD of the Bank;
- 9.1.5. informing Committee about the evidence of violation of CLRS, facts of corruption and/or fraud, facts of illegal or unethical actions in the activities of the Bank, participation or suspicion of participation of the Bank, its employees at any prohibited practices and misconduct, violations of rights of the Bank's customers, employees and third parties, identified in the course of the performance of CCD's functions or conducted inspections and investigations, as well as fines, penalties and other sanctions imposed and/or collected from the Bank in this regard and the taken measures;
- 9.1.6. immediately inform Committee of all circumstances that prevent them and/or CCD employees from performing their duties;
- 9.1.7. development of a three-year program for the development and improvement of the quality of the Bank's compliance control, ensuring its timely implementation;
- 9.1.8. performing other functions and tasks in accordance with the job responsibilities;

9.2. The main obligations of CCD employees include:

- 9.2.1. ensuring the confidentiality of information obtained in the performance of their official duties;
- 9.2.2. storage of information and materials obtained in the course of ongoing investigations and the performance of their official duties within the period established by the legislation of the Republic of Uzbekistan;
- 9.2.3. taking the necessary measures to achieve the goals and objectives on the management of compliance risk within its competence;

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 12</i>

9.2.4. immediately informing Head of CCD of all circumstances that prevent them from performing their functions;

9.2.5. regularly taking specialized courses on improvement of qualification.

9.3. CCD employees are responsible for:

9.3.1. distortion of information obtained in the course of performing their official duties;

9.3.2. non-observance of the confidentiality of information obtained in the performance of official duties, and any information constituting banking secrecy in accordance with the legislation of the Republic of Uzbekistan;

9.3.3. use of the information received in the performance of official duties for personal purposes or in the interests of third parties;

9.3.4. failure to ensure the safety and return of documents received from the structural units of the Bank.

9.4. CCD employees have responsibilities in accordance with the current legislation of the Republic of Uzbekistan for non-performance (improper performance) of the tasks assigned to them, as well as internal regulatory documents regulating the activities and responsibilities of CCD employees.

9.5. Head of CCD is responsible for:

9.5.1. compliance with this Regulation and compliance control activities with the legislation of the Republic of Uzbekistan, international standards on compliance and compliance functions at banks recommended by the Basel Committee on Banking supervision;

9.5.2. organization of CCD activities, its coordination;

9.5.3. assignment of tasks to CCD employees and control over their execution;

9.5.4. timely implementation of IRD on compliance control;

9.5.5. development of CCD's annual budget and control of CCD's expenses within the framework of CCD's approved budget;

9.5.6. professional development of CCD employees;

9.5.7. providing reports to SB, Committee, Management Board and structural units of the Bank for taking the necessary measures;

9.5.8. control over the timely and proper implementation of measures on elimination of deficiencies and violations related with non-compliance with CLRS and measures on elimination of identified violations and shortcomings;

9.5.9. submission to Committee and SB of the information provided in the Regulation on Audit, Anti-Corruption and Ethics Committee under SB of the Bank, the Compliance Policy and this Regulation.

9.6. CCD employees are prohibited from the followings to ensure independence and objectivity:

9.6.1. fulfill obligations related to the business and/or operational activities of the Bank;

9.6.2. participate in the process of making any decisions not related to compliance control;

9.6.3. approve operations, except those directly related to compliance control activities;

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 13</i>

9.6.4. manage employees who are not CCD employees, unless such employees are appointed to assist in the work of CCD.

10. Principles of CCD activities

10.1. CCD employees in their work are guided by the ethics rules for CCD employees (Appendix #1 to this Regulation), as well as the Code of business conduct and corporate ethics of the Bank. At the same time, an employee of CCD becomes familiar with the ethics rules when hiring him/her at CCD and signs an obligation to comply with these rules (Appendix #2 to this Regulation).

10.2. Independence:

10.2.1 CCD is directly subordinate to SB and Committee;

10.2.2. Head of CCD is appointed to the position based on an open competition to be held by the Bank jointly with the Agency and is approved by SB with the recommendation of Committee. The dismissal of Head of CCD should be agreed with the Agency and he/she will be dismissed based on the decision of SB with the recommendation of Committee;

10.2.3. CCD should be independent from the interference and influence of any persons when performing assigned tasks in order to properly perform them and to ensure objective and impartial judgments. The Head of CCD should provide Committee with information on such interference and discuss the possible consequences;

10.2.4. Salary payment and remuneration to CCD employees are carried out based on the staff list and budget of CCD approved by SB on the proposal of Committee;

10.2.5. Remuneration of CCD employees does not depend on the financial results of the Bank and the results of economic activities of the certain business units of the Bank, but is determined in accordance with Regulation on the remuneration system of employees CCD and the criteria for assessing CCD's activities established for CCD, approved by SB upon the recommendation of Committee, and criteria for evaluating employees of CCD, approved by Committee and revised annually no later than January of the month following the reporting year;

10.2.6. The Bank's Management should provide CCD with the necessary financial and other resources in accordance with the approved budget of CCD.

10.3. Objectivity:

10.3.1. Individual objectivity of CCD employees is ensured through impartiality, unbiased attitude and prevention of conflicts of interest;

10.3.2. CCD employees are obliged to promptly inform the Head of CCD about any situations related to the real or potential violation of the independence and/or objectivity of CCD employee, including in the form of a conflict of interest or restrictions of the rights of CCD employee.

10.4. Consulting services that potentially threaten the independence and/or objectivity of CCD employees, timely performance of other duties stipulated by job descriptions of the employees of CCD, may only be provided with the consent of Committee.

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 14</i>

10.5. Information about potential threats to independence and/or objectivity CCD should be disclosed to the subject of the assignment when making a decision on providing of consulting services.

10.6. The individual independence of each employee of CCD must be confirmed by a signed declaration of independence form (Appendix #3 to this Regulation).

11. Organization of CCD activities

11.1. CCD is a structural unit organized at the Head Office of the Bank and is managed by the Head of CCD.

11.2. Head of CCD is subordinate functionally to Committee and administratively to SB.

11.3. To carry out activities at the proper level, CCD should be provided with the necessary staffing units. The organizational structure of CCD is formed from the point of view of effective organization of its activities and properly fulfillment of assigned tasks.

11.4. The organizational structure and staffing units of CCD are approved by SB in agreement with Committee on the basis of the presentation of the Head of CCD.

11.5. Director of CCD rotates the certain employees of CCD in order to prevent the deterioration of critical thinking skills as a result of performing permanent and repetitive duties. Rotation of CCD employees both within CCD and to/from other structural subdivisions of the Bank is regulated by the Bank's IRD.

11.6. In order to effectively implement compliance control, combating corruption and fraud at the Bank, an employee of ICD is appointed at each branch of the Bank, whose activities are controlled and coordinated by Head of CCD in terms of compliance control, combating corruption and fraud.

11.7. When appointing ICD employees at branches, candidates are agreed with Head of CCD.

11.8. Employees of ICD at the branches of the Bank are simultaneously subordinate to Head of CCD in terms of informing CCD about compliance by the employees of the branch with the requirements of IRD on combating corruption and fraud, protecting the rights of Bank's customers, employees and third parties, preventing and eliminating conflicts of interest, the whistleblowing policy, and also providing information to CCD on fines, penalties and other sanctions imposed and/or collected from the relevant branch of the Bank in connection with the realization of the compliance risk, losses related to facts of corruption, fraud, violation of the rights of customers, employees of the Bank and third parties in order to input this information to the relevant database of CCD, as provided for in the article 7.2.10 of this Regulation.

11.9. Head of CCD has the right to change the volume of bonuses for ICD employees at branches of the Bank.

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 15</i>

12. Requirements for CCD employees

12.1. CCD should be staffed with full-time employees who are required to carry out tasks efficiently and with duely professionalism.

12.2. CCD must have specialists with the necessary knowledge and/or skills in the field of compliance, combating corruption and fraud, observing the rights of Bank's customers, employees and third parties.

12.3. CCD employees must meet the following requirements:

12.3.1. have a higher education in economics or law;

12.3.2. Head of CCD must have at least five years of experience in the banking and (or) financial system, including at least three years of experience in compliance control as a senior employee;

12.3.3. have knowledge in the field of the legislation of the Republic of Uzbekistan on combating corruption and fraud, the regulations of CBU, as well as the legislation of the Republic of Uzbekistan on protection of the rights of bank's customers, employees and third parties, CLRS in the sphere of business ethics;

12.3.4. have knowledge and skills in the field of legislation of the Republic of Uzbekistan and international standards on compliance and compliance functions in banks.

12.4. CCD employees must:

12.4.1. be well aware of the business and activities of the Bank. At the same time, senior employees of CCD must have direct experience in the banking industry in order to adequately assess the presence of risks, possible weaknesses in the system of risk management, compliance and internal control;

12.4.2. possess sufficient knowledge of CLRS and their practical application in the Bank's activities, the requirements of the Basel Committee on compliance and the compliance function of banks, recommendations on corporate governance of banks;

12.4.3. be aware of the relevant standards and regulations related to combating corruption and fraud, the requirements of CLRS in the field of the Bank's activities, the Bank's IRD;

12.4.4. have an inquisitive mind to identify deficiencies of the systems of compliance and internal control in the course of work, as well as the necessary skills to assess and analyze these deficiencies;

12.4.5. have such personal qualities as honesty, conscientiousness and adherence to high ethical standards of conduct. The main qualities of CCD employees are given in the ethics rules for CCD employees (Appendix #1 to this Regulation).

13. Process of providing consulting service

13.1. CCD's consulting services are aimed at providing assistance and mitigating compliance risks, and exclude CCD from taking responsibility for management decisions.

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 16</i>

13.2. Consulting services must be performed by CCD at the special request of the customer, which must contain information on the objectives and scope of the assignment, the final reporting form, questions of responsibility and other expectations of the customer.

13.3. The objectives of assignments on consulting should include consideration of questions on application of the legislation of the Republic of Uzbekistan and IRD of the Bank in terms of compliance risks, compliance controls, combating corruption and fraud, violation of the rights of customers, employees of the Bank and third parties, violation of code of conduct in the framework agreed with the customer.

13.4. When performing consulting, CCD employees must take into account risks and controls in accordance with the objectives of the assignment, as well as be prepared for the presence of other significant risks and control deficiencies.

13.5. When performing consulting, CCD employees must ensure that its scope and content are sufficient to achieve the agreed goals. If CCD employees have doubts about the scope and content of the assignment during the execution of the assignment, these doubts should be discussed with the customer in order to decide whether to continue with the assignment.

13.6. CCD should develop and document consulting assignment programs to achieve the objective of the assignment, and consulting assignment programs may vary in form and content depending on the nature of the assignment.

13.7. Before starting to provide consulting services that may lead to a decrease in the degree of independence or objectivity of CCD, Head of CCD must inform Committee in written form about this, describe the nature of the decrease in the degree of independence or objectivity. In such cases, consulting services will be provided only upon written approval by Committee. Also, Head of CCD must ensure that there is no conflict of interest when providing consulting services.

13.8. The nature and types of consulting services may include:

13.8.1. informal consultations (participation at committees, working groups, responses to inquiries from employees of other structural units on compliance risks, compliance controls, combating corruption and fraud issues, violation of the rights of Bank's customers, employees and third parties, training/seminars, etc.);

13.8.2. special assignments for consulting (participation at the process of implementing large projects of the Bank, etc.);

13.8.3. urgent consulting assignments (requests from SB and/or Committee on the certain operations of the Bank, compliance risk, compliance controls, combating corruption and fraud issues, violation of the rights of Bank's customers, employees and third parties).

13.9. Upon completion of the provision of consulting services, CCD must provide the final results of the assignment to the customer. Methods for submission of results on consulting services may include, but not limited to:

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 17</i>

13.9.1. for informal consultations: correspondence via corporate e-mail, online consulting, trainings/seminars, minutes of meetings of committees and working groups;

13.9.2. for special assignments in consulting: report with observations/recommendations;

13.9.3. for urgent consulting assignments: report with initiative proposals/recommendations.

14. CCD accountability

14.1. CCD in its activities is accountable to SB and Committee. Head of CCD submits a quarterly and annual report to Committee and SB.

14.2. CCD's annual report must contain information on the identified compliance risks, including corruption risks, fraud risks taking into account the database on facts of non-compliance with CLRS, facts of corruption and fraud, and the violations of rights of Bank's customers, employees and third parties, not observing of code of conduct, results of the assessment of these risks, the results of compliance testing; on the results of assessing the compliance of IRD with the legislation of the Republic of Uzbekistan, violations or non-compliance with the requirements of CLRS and IRD of the Bank, prohibited operations and measures taken on elimination of violations of compliance controls, measures on combating corruption and fraud, appeals of Bank's customers and employees and third parties on the facts of fraud, corruption and violation of the rights of Bank's customers, employees and third parties and the results of their consideration and taken measures, conducted trainings and education for employees of CCD and the Bank on combating corruption, fraud, preventing conflicts of interest, protecting the rights of consumers and employees of the Bank.

14.3. CCD's quarterly report must contain information on the revealed compliance risks and their assessment, significant deficiencies in compliance and compliance risks, the facts of violations/non-compliance with the requirements of CLRS and IRD of the Bank, and the status of measures being taken on elimination of them, revealed and prevented conflicts of interest, measures taken on elimination of violations of compliance controls on combating corruption and fraud, on the results of the analysis of appeals of citizens, employees of the Bank and third parties, measures taken on these appeals, the results of inspections conducted by CBU and authorized government bodies of the Republic of Uzbekistan, the paid fines, penalties, other measures and sanctions imposed on the Bank based on the results of inspections conducted by CBU and authorized government bodies of the Republic of Uzbekistan and/or non-compliance with CLRD and IRD of the Bank, the results of monitoring the effectiveness of the Bank's hot lines and the other reporting channels of the Bank, informing interested persons of the Bank about the measures taken by the Bank on combating corruption, the results of monitoring the implementation of Anti-corruption Policy, Anti-fraud Policy, Policy on prevention and elimination of conflicts of interest, Code of business conduct and corporate ethics, Whistleblowing Policy, Information Policy, Procedure on effective cooperation with supervisory authorities in the field of combating corruption.

14.4. The detailed requirements for reporting of CCD to Committee, SB, CBU and authorized government bodies of the Republic of Uzbekistan and the deadline of their submission are regulated

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 18</i>

with this Regulation, Regulations on Audit, anti-corruption and ethics Committee, Code of business conduct and corporate ethics and Compliance Policy.

15. Procedure of keeping CCD documents

15.1. All documents related to CCD's activities are maintained in accordance with the nomenclature list approved annually by Head of CCD.

15.2. The composition of the documents on the results of inspections and official investigations, CCD is formed in the following order:

15.2.1. grounds for conducting and inspection or official investigation, scope of inspection or official investigation;

15.2.2. report on the inspection or official investigation;

15.2.3. analytical and other materials obtained in the course of conducting an inspection or official investigation;

15.2.4. registers, documents, files and information received in the course of an inspection or official investigation;

15.2.5. taken measures and recommendations (involving into responsibility, existence of damage and/or loses of the reputation of the Bank, measures plan on correctional actions and establishment of control on prevention of the recurrence of such cases);

15.2.6. results of monitoring (status of execution of the measures on correctional actions and establishment of control on prevention of the recurrence of such cases).

15.3. The composition of documents on the results of inspections and official investigations is considered as the property of the Bank and the information contained in them is confidential.

15.4. The composition of the documents for consulting services is formed in the following order:

15.4.1. request for consulting services;

15.4.2. documents and information obtained in the process of providing consulting services;

15.4.3. report (memo and other documents grounding the performance of the task);

15.4.4. the results of monitoring of the issues revealed as a result of conducting the consulting, within the frame agreed with the customer.

15.5. The Head of CCD sets restrictions on the use of information in order to control its spreading.

15.6. All correspondence between CCD and external bodies (CBU, etc.) and internal structural units of the Bank (branches, departments, divisions of the Bank) are registered in accordance with the procedure established at the Bank. Documents and correspondence are kept in separate folders on the relevant matters of CCD's activities.

15.7. In order to restrict access to documents (correspondence with CBU and the authorized government bodies of the Republic of Uzbekistan, including paper and electronic copies of reports provided to the authorized government bodies; registers, etc.) being used in CCD's activities, they

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 19</i>

are kept in specially equipped premises or in a fireproof and sealed safe within the terms established by law, but not less than five years.

15.8. After the expiration of the storage period, the documents are provided to the archives of the Bank in the established order.

16. Relationship with the Management and other units of the Bank

16.1. In order to maintain an effective system of compliance control in the Bank, the Management board of the Bank timely:

16.1.1. provides CCD with financial resources within the framework of CCD's budget and resources necessary for the performing of its activities;

16.1.2. provides CCD with information and relevant documents on changes to the Bank's strategy and internal policy, projects of the Bank, new banking products/services and process/activities of the Bank and changes to existing products/services and process/activities of the Bank, existing and expected risks in the Bank;

16.1.3. ensures the timely development and execution by the relevant structural units of the Bank of an action plan on elimination of deficiencies and violations of compliance and compliance controls, revealed facts of corruption and fraud, facts of violation of the rights of Bank's customers, employees and third persons revealed in course of considering appeals of Bank's customers and employees.

16.2. The Head of CCD should take measures on regulating situations which are obstructing the performance of tasks assigned to CCD through:

16.2.1. addressing in written form to or organizing meetings with the Chairman of the Management board and/or the Bank's Management; or

16.2.2. providing information about such obstacles and their possible consequences to Committee and/or SB.

16.3. In order to effectively cooperate and to take preventive measures, CCD submits copies of conclusions/reports on revealed deficiencies/risks (in terms of violations of compliance and compliance controls, facts of corruption and fraud, violations of the rights of Bank's customers, employees and third parties) and information on the results of conducted inspections and investigations, and information on facts of realization of compliance risks, including violation of CLRS, facts of corruption, fraud, violation of rights of Bank's customers, employees and third parties and fines, other sanctions imposed to or collected from the Bank due to the realization of these risks to BRMD.

16.4. CCD has the right to request from the structural units and employees of the Bank information and documentation necessary for the performance of CCD's official duties. In turn, the structural units and employees of the Bank are responsible for the timely submission of the requested information and documents to CCD.

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 20</i>

17. Relationship with CBU and authorized government bodies of the Republic of Uzbekistan

17.1. On the basis of a written request from CBU, an authorized government body of the Republic of Uzbekistan, CCD can:

- 17.1.1. conduct control on certain matters of the Bank's activities and (or) the activities of the Bank for a certain period;
- 17.1.2. provide information to CBU and Agency on certain matters related to the competence of CCD.

17.2. At the request of CBU, an authorized government agency, CCD submits information and reports to CBU and authorized government bodies as specified in Chapter 9 of the Compliance Policy.

17.3. CCD participates at meetings organized with the initiative of CBU, authorized government bodies of the Republic of Uzbekistan on compliance and compliance controls, combating corruption and fraud, observance and protection of the rights of Bank's customers, employees and third parties.

18. Assessment of CCD's performance

18.1. Committee annually evaluates CCD's activities based on the results of year and provides the results of evaluating CCD's activities to SB within the framework of the submission of an annual report on Committee's activities.

18.2. An independent assessment of CCD's activities by independent experts can be conducted with the initiative of Committee and after the approval of SB.

18.3. The performance of CCD and its employees is assessed annually in accordance with the criteria for assessing the performance of CCD and its employees as established in Methodology for assessing the activities of Compliance Control Department of the Bank.

18.4. The performance of the Head of CCD is assessed by Committee, the performance of CCD employees is assessed by the Head of CCD together with the Chairman of Committee, and the results of the annual assessment of performance of CCD and employees of CCD are discussed and approved by Committee.

19. Final provisions

19.1. The present Regulation is approved at the meeting of SB and comes into force from the date of its approval and are valid until its cancellation.

19.2. This Regulation should be reviewed regularly, but at least once a year, by the Head of CCD. The approval of amendments and additions to this Regulation is conducted by SB with recommendation of Committee.

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 21</i>

19.3. If certain clauses of this Regulation come into conflict with the norms of the legislation of the Republic of Uzbekistan and the Charter of the Bank as a result of changes in the legislation of the Republic of Uzbekistan and the Charter of the Bank, these clauses become invalid until making amendments to this Regulation, it should be guided with the legislation of the Republic of Uzbekistan and the Charter of the Bank.

19.4. In all cases not specified in this Regulation, the provisions of the Charter of the Bank and the norms of the existing legislation of the Republic of Uzbekistan are applied.

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 22</i>

Appendix 1.

Ethics Rules for CCD employees

1. CCD employees must adhere to the following principles:

- honesty (conscientiousness);
- objectivity;
- confidentiality;
- professionality.

2. Rules of ethics:

2.1 Honesty (conscientiousness)

CCD employees should:

- perform their work with honesty, conscientiousness and responsibility;
- act within the law and, disclose relevant information if it is required by law or professional standards;
- not knowingly participate at actions or activities discrediting CCD or the Bank;
- respect the legally and ethically justified goals of the Bank and contribute to their achievement.

2.2 Objectivity (impartiality).

CCD employees:

- should not participate at any activity that could damage their impartiality or be perceived as causing such damage. This also applies to activities and relationships that are contrary to the interests of the Bank;
- should not accept as a gift that could be prejudicial to their professional opinion or be perceived as causing such damage;
- should disclose all material facts known to them that, if not disclosed, could give rise to compliance risk and or a breach of CLRS.

2.3 Confidentiality.

CCD employees:

- should be reasonable and discreet in the use and retention of information obtained in the course of performing their duties;
- should not use the information for personal gain or in any other way that is contrary to law or detrimental to the achievement of legally and ethically justified purposes of the Bank;
- should always comply with the requirement of confidentiality, unless specifically authorization is granted to disclose the information or where there is a legal or professional obligation to disclose;
- should not use the information obtained in the course of performing their job duties for personal purposes or in the interests of a third party.

2.4 Professional Competence.

CCD employees should:

- participate only in those tasks for which they have sufficient professional knowledge, skills and experience;

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
<i>IND: PL-22-18-05</i>	<i>Version #:2.1</i>	<i>Effective Date: 01.08.2022y.</i>	<i>Page No: 23</i>

- continuously improve their professionalism, as well as the efficiency and quality of the tasks being performed;
- should not exaggerate their knowledge and experience;
- constantly monitor developments in the field of compliance and compliance controls, including national and international practices on compliance, compliance controls and other relevant legal and regulatory requirements.

2.5 Ethical Requirements.

Ethical requirements for objectivity arise in a variety of situations, and the followings should be taken into account when addressing them:

- CCD employees may find themselves in situations where they may be under pressure that could adversely affect their objectivity. It is not possible to describe all the situations in which such pressures may arise, to give prescriptions for all such cases. When establishing rules to the detriment of the objectivity of an employee, CCD should be guided by common sense;
- relationships that allow for bias, partiality or influence of other persons to the detriment of the objectivity of an employee of CCD;
- CCD employees should not accept or offer gifts or equivalent benefits that can reasonably be expected to have a significant and unacceptable effect on their professional judgment.

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
IND: PL-22-18-05	Version #:2.1	Effective Date: 01.08.2022y.	Page No: 24

Appendix 2.

The form of obligation to comply with CCD Employees Ethics Rules

I, _____, being an employee of Compliance control department (hereinafter referred to as CCD) of JSCMB "Ipoteka-Bank" (hereinafter referred to as Bank), undertake to unconditionally comply with the requirements of the CCD Employee Ethics Rules (hereinafter referred to as Ethics Rules).

In particular, I will strictly comply with Ethics rules of CCD employees, as well as the Code of business conduct and corporate ethics of the Bank.

I undertake:

- conduct the activities of the Bank in an ethical, lawful, direct and honest manners that do not compromise the Bank's mission, reputation and integrity;
- avoid situations (personal interests, family ties, etc.) that lead to a conflict of interest or create the appearance of a conflict of interest;
- participate in any activity that could harm my impartiality or be perceived to do so;
- not make any profit or accept any gift that could be detrimental to my professional judgment or be perceived to be detrimental.

I am warned that failure to comply or inadequately comply with these Ethics Rules may result in disciplinary action, including termination of employment.

Having carefully read the above, I _____ understand and agree with these Ethics Rules and undertake to comply with them in the performance of my job duties.

_____	_____	_____
Name of CCD employee	Signature	Date

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
IND: PL-22-18-05	Version #:2.1	Effective Date: 01.08.2022y.	Page No: 25

Appendix 3.

Declaration of Individual Independence

I, _____, being an employee of Compliance control department (hereinafter referred to as CCD) of JSCMB "Ipoteka-bank" (hereinafter referred to as Bank), become aware of that:

1. Each employee of CCD is obliged to conduct the Bank's activity in an ethical, legal, direct and honest way that does not compromise the Bank's mission, reputation and integrity;
2. CCD employees should avoid situations (personal interests, family ties, etc.) that lead to a conflict of interest or create the appearance of a conflict of interest;
3. CCD employees are prohibited from engaging in any activity that could damage the impartiality of their assessment or be perceived as causing such damage;
4. CCD employees are prohibited from accepting any benefit or gift that could be detrimental or perceived as detrimental to their professional judgment. CCD employee should immediately notify Head of CCD about all offers of gratuities and gifts;
5. Any possible or existing conflict of interest must be disclosed as soon as CCD employee becomes aware of a potential or existing conflict of interest;
6. Failure to disclose a known possible or existing conflict of interest may result in disciplinary action, including termination of employment;
7. Kinship includes spouses, children, siblings, aunts, uncles or anyone living with me or with my family members;
8. Withholding information about relatives working in the business units/divisions listed below may be grounds for dismissal.

Having carefully read the above, I _____ understand and agree with this conflict of interest and family ties and undertake to comply with it in the performance of my job duties.

Check the box that describes your situation:

No, I do not have possible or existing conflict of interest or any family ties that could affect my objectivity and impartiality in the performance of my job duties

(project/ branch/ structural unit)

Yes, I have a possible or existing conflict of interest or family ties in the process of performance of my duties

(project/ branch/ structural unit)

Name of CCD employee	Signature	Date
Name of Head CCD	Signature	Date

JSCMB "IPOTEKA-BANK"			
REGULAITON ON COMPLIANCE CONTROL DEPARTMENT			
IND: PL-22-18-05	Version #:2.1	Effective Date: 01.08.2022y.	Page No: 26

Appendix 4.

Details of compliance control functions by CCD units

Methodology and CLRS compliance control unit
<p>Main functions:</p> <ul style="list-style-type: none"> - development of methodology documents of CCD and its units; - control over timely introduction of changes to IRD of the Bank in accordance with changes in CLRS, Bank’s business processes in connection with the introduction of new banking products, business processes or changes in existing ones; - identification, assessment of compliance risks, risks of corruption, fraud and development of appropriate compliance controls; - development of a three-year program on development of compliance in the Bank; - formation and maintenance of a database of fines, penalties and other sanctions imposed and / or collected from the Bank, as well as fines, penalties and other sanctions imposed and / or collected from the Bank in connection with the implementation of the compliance risk; - cooperation with the Central Bank of Uzbekistan and authorized government bodies of the Republic of Uzbekistan; - development of programs and training of the Bank's employees in compliance and compliance risks; - reporting to SB and Committee on the activities of CCD on a consolidated basis in accordance with Compliance Policy and Regulations of CCD.
Ethics and anti-fraud compliance control Unit
<p>Main functions:</p> <ul style="list-style-type: none"> - monitoring the implementation of Anti-fraud Policy of the Bank; - control over the implementation of Policy on prevention and elimination of conflicts of interest, Wistleblowing Policy, Information Policy, Code of business conduct and corporate ethics of the Bank; - considering appeals of Bank’s customers, employees and third parties on fraud, violations of their rights, unethical behavior of the Bank's employees and taking necessary measures; - conducting measures and investigations in order to confirm the facts of a conflict of interest, unethical behavior of the Bank's employees, fraud, violation of the rights of Bank’s customers, employees and third parties; - maintenance and analysis of a database on facts of fraud and violation of the rights of Bank’s customers, employees and third parties, the realization of a conflict of interest, as well as relevant fines, penalties and other sanctions imposed and/or collected from the Bank, development of new and improvement of relevant controls;

- cooperation with the Central Bank and authorized government bodies of the Republic of Uzbekistan on fraud, observance and protection of the rights of Bank's customers, employees and third parties;
- evaluation of the effectiveness of the Bank's "hot lines", anonymous and other channels for reporting by citizens of the Republic of Uzbekistan and employees of the Bank on combating fraud and protecting rights;
- consultations and training of the Bank's employees on combating fraud, complying with Code of business conduct and corporate ethics, observance and protection of the rights of customers, employees and third parties, prevention and elimination of conflicts of interest;
- providing reports on the results of work to Supervisory Board and Committee;
- provision of information to the Central Bank and authorized government bodies of the Republic of Uzbekistan.

Anti-bribery and anti-corruption unit

Main functions:

- control over the implementation of Anti-corruption Policy of the Bank;
- considering appeals of Bank's customers, employees and third parties on corruption and bribery, and taking the necessary measures;
- conducting measures and investigations in order to confirm the facts of corruption, bribery on the part of the Bank's employees;
- maintenance and analysis of a database on facts of corruption, as well as relevant fines, penalties and other sanctions imposed and/or collected from the Bank, development of new and improvement of relevant controls;
- cooperation with the Central Bank and authorized government bodies of the Republic of Uzbekistan on combating corruption and bribery;
- evaluation of the effectiveness of the Bank's "hot lines", anonymous and other channels for reporting by citizens of the Republic of Uzbekistan and employees of the Bank on combating corruption and bribery;
- participation in the commission on public procurement of the Bank;
- consultations and training of the Bank's employees on combating corruption and bribery;
- providing reports on the results of work to Supervisory Board and Committee;
- provision of information to the Central Bank and authorized government bodies of the Republic of Uzbekistan.

