



ANTI-CORRUPTION

# POLICY

**UKTMMP is a metallurgical company that produces titanium ingots and alloys, titanium sponge, magnesium ingots, vanadium pentoxide and titanium slag.**

UKTMMP declares zero tolerance and prohibits bribery in any form by its employees and business partners, directly or indirectly (including through third parties), namely:

- to promise, offer, pay, give a present or assist with any type of bribe, pass any material or other value:
  - to its business partners, including consumers;
  - to state officials, including local governance
  - to organizations or institutions owned by or governed by state;
- to pay for assistance and commercial bribery.

UKTMMP conducts its activities in strict compliance with applicable legal regulations, including relating to anti-corruption. UKTMMP makes the necessary effort to eliminate the causes and conditions leading to corruption.

## **PURPOSE:**

to comply with requirements and expectations of our customers and other concerned parties.

## **FOR THAT WE:**

- develop anti-corruption management system in accordance with 37001 and laws of the Republic of Kazakhstan;
- encourage to confidentially report your doubts with the best of intentions or on the basis of a reasonable assumption of corrupt practices and exclude retaliation (UKTMMP will support any employee or business partner who refuses to make illegal payments).
- prevent corruption by involving employees of all levels in anti-corruption activities, as well as through the analysis of information and independent control of business processes.
- ensure independence of the Anti-Corruption Policy Department
- evaluate and understand conditions in which we conduct our activity, understand and clarify consequences of non-compliance with the anti-corruption policy.

UKMTP retains the right to, upon receiving information about corrupt practices:

- to apply disciplinary sanctions up to and including the dismissal of an Employee of UKTMMP
- to conduct internal investigations with the involvement, if necessary, of law enforcement or other competent authorities
- to impose penalties and prosecute (by court order).

All employees and business partners acting on behalf of UKTMMP are responsible for compliance with this Policy and other documents, intended to its implementation.

**UKTMMP MANAGEMENT ASSUMES RESPONSIBILITY FOR THE IMPLEMENTATION OF THIS POLICY**

**PRESIDENT OF UKTMMP**

**A. MAMUTOVA**