

THE EUROPE-UZBEKISTAN ASSOCIATION FOR ECONOMIC COOPERATION CODE OF CONDUCT

Introduction

The Europe-Uzbekistan Association for Economic Cooperation (hereinafter – EUROUZ) has designated the following Code of Conduct (hereinafter – the Code) that shall serve as a guidance and will apply to all its members and employees (herein “members”). This Code of Conduct is an integral part of the EUROUZ internal rules and procedures.

Ethical Principles and Core Values

- Honesty;
- Transparency;
- Integrity;
- Trustworthiness;
- Independence;
- Mutual respect;
- Responsibility;
- Accountability;
- Obedience to the law;
- Teamwork;
- Commitment to the Code.

Reporting/Speaking Up

The EUROUZ encourages all members to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.

Members must report suspected unethical, illegal or suspicious behavior immediately. The EUROUZ does not tolerate retaliation against anyone who makes a good faith report of alleged misconduct or otherwise assists with an investigation or audit. For details, please refer to EUROUZ Bribery Whistleblowing Policy.

Equal Opportunity

The EUROUZ will not tolerate discrimination based on race, color, religion, gender, age, national and ethnic origin, sexual orientation, marital status, disability, or other protected classes.

Harassment

The EUROUZ has a zero-tolerance policy for any form of harassment, including sexual harassment and bullying. For details, please refer to EUROUZ Sexual Harassment Policy. Treat all members, business partners and other stakeholders with dignity and respect at all times. Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action, including termination.

Harassment can include actions, language, written words or objects that create an intimidating or hostile work environment, such as:

- yelling at or humiliating someone;
- physical violence or intimidation;
- unwanted sexual advances, invitations or comments;
- visual displays such as derogatory or sexually-oriented pictures or gestures;
- physical conduct including assault or unwanted touching;
- threats or demands to submit to sexual requests as a condition of employment or avoid negative consequences.

Bullying

We are committed to ensuring that our members, contractors, and partners work in a safe and respectful environment free of bullying.

Bullying can include:

- spreading malicious rumour or gossip;
- excluding or isolating someone socially;
- establishing impossible deliverables;

- withholding necessary information or purposefully giving the wrong information;
- intimidating someone;
- impeding someone's work;
- unfairly denying training, leave or promotion;
- constantly changing work guidelines;
- sending offensive jokes or emails;
- criticising or belittling someone constantly;
- tampering with a person's personal belongings or work equipment.

Conflicts of Interest

A conflict of interest can occur when an employee's activities, investments or associations compromise their judgment or ability to act in the organization's best interests. Members should avoid situations that can give rise to conflicts of interest. Members need to disclose any relationships, associations or activities that could create actual, potential, or even perceived conflict of interest to the EUROUZ Secretariat. For details, please refer to the EUROUZ Conflict of Interest Policy.

External Communication on behalf of the EUROUZ

External communication on behalf of the EUROUZ to represent the organization to media and/or legal authorities is permitted only after written authorization of the EUROUZ Secretariat.

Confidentiality

The EUROUZ and its members maintain the confidentiality of all proprietary information. Proprietary information includes all non-public information that might be harmful to the organization and its customers and business partners if disclosed.

Confidential information can include:

- members and partners lists;
- salaries information;

- organization policies and procedures;
- financial statements;
- marketing plans and strategies;
- sponsor information;
- any other information that could damage the organization or its member if it was disclosed.

Privacy

The EUROUZ complies with the requirements of European and international privacy laws. All members agree to adhere to an agreement containing information confidentiality and non-disclosure. The Association and its members do not disclose any private, personal information of:

- members;
- employees;
- partners;
- third parties.

Members store all personal information securely, mark it as confidential and store it only for as long as it is needed for the purpose it was collected. When providing personal information, members limit access to only those with a clear business need for the information. Members are required to report any privacy breaches, including the loss, theft of or unauthorized access to personal information, to the EUROUZ Secretariat.

Bribery and Facilitation Payments

The EUROUZ will not attempt to influence the judgement or behavior of a person in a position of trust by paying a bribe or kickback. This applies to persons in government and private businesses. The Association does not permit government officials or private businesses to facilitate (or “grease”) payments to secure or speed up routine actions. For details, please refer to EUROUZ Anti-Bribery and Corruption Policy.

Gifts and Entertainment

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also can create the perception that they influence business decisions. The EUROUZ is committed to working only on the merits of its products, services and people and complies with all legal requirements for giving and receiving gifts and entertainment. For details, please refer to EUROUZ Gifts and Entertainment Policy.

Political Contributions

The EUROUZ does not make political contributions. Members are free to support any political party or entity personally. However, this must be kept separate from the EUROUZ activity.

Charitable Contributions

The EUROUZ may make charitable contributions to causes and organizations that are not politically affiliated. Members should check with EUROUZ Secretariat before making any charitable contributions on behalf of the Association.

Record Keeping

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records.

Members are required to:

- maintain these records and protect their integrity for as long as required.
- maintain official record-keeping systems to retain and file records required for business, legal, financial, research or archival purposes.
- dispose of your records according to the organization's records retention and disposition schedule. The retention period is five years.
- members should never destroy documents in response to an investigation or auditor in anticipation.

Protection and Proper use of EUROUZ Assets

The EUROUZ requires all members to protect its assets. All assets should be used for legitimate purposes, efficiently, and for organization business only. Assets include facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities, and organization funds. Suspected incidents of fraud, theft, negligence, and waste should be reported to the EUROUZ Secretariat.

Money Laundering

The EUROUZ complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin. Members must never knowingly facilitate money laundering or terrorist financing and must take steps to prevent inadvertent use of the organization's business activities for these purposes.

Members are required to immediately report any unusual or suspicious activities or transactions such as:

- attempted payments in cash or from an unusual financing source;
- arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer.
- unusually complex deals that don't reflect a real business purpose.
- attempts to evade record-keeping or reporting requirements.
- any suspected money laundering and terrorist financing to the EUROUZ Secretariat.

Environment

The EUROUZ is committed to operating in an environmentally responsible manner, from the provision of products and services to the operation of its offices and facilities, selection of suppliers and other business activities.

The Association complies with all applicable environmental laws and regulations and self-directed commitments to sustainable practices and environmental protection.

Code of Conduct Acknowledgement

By certifying to the organization code of conduct, you acknowledge that:

- you have read the entire code of conduct and understand your responsibilities related to it.
- you have had the opportunity to ask questions to clarify any unclear aspects of the code.
- you agree to abide by its principles.
- you agree to report to the organization any violations of the code;
- you agree to cooperate in any investigations of violations of the code.

Documents complimenting this Code of Conduct:

1. EUROUZ Bribery Whistleblowing Policy
2. EUROUZ Sexual Harassment Policy
3. EUROUZ Conflict of Interest Policy
4. EUROUZ Anti-Bribery and Corruption Policy
5. EUROUZ Gifts and Entertainment Policy