

THE EUROPE-UZBEKISTAN ASSOCIATION FOR ECONOMIC COOPERATION
(EUROUZ)

Gifts and entertainment policy

(Version 1.0)

Introduction

The purpose of this policy is to ensure that EUROUZ (herein “the Association”) and its members, employees (herein “members”) comply with the anti-bribery and corruption policy, bribery laws and best practices in combating corruption in all of the countries and business areas in which the Association operates. This policy is part of the Association’s commitment to high legal and moral standards in its business activities.

Bribery is an offer, promise, financial or another reward to a person with public or private responsibilities as an inducement or reward for doing something (or not, as the case may be) improperly, i.e. in bad faith or breach of trust.

One-way bribes could be paid or received via gifts or entertainment. This policy outlines the procedures for the authorisation of the expenditure and for recording, all gifts given and all entertainment provided.

Implementation

The EUROUZ Secretariat (herein “the Secretariat”) has ultimate responsibility for ensuring that the business establishes systems and controls to comply with this policy.

Scope

This policy applies to:

- a) All EUROUZ’s operations within Uzbekistan;
- b) All EUROUZ’s operations internationally;
- c) All EUROUZ’s members, as well as agency workers, consultants and contractors, irrespective of their location, function, grade or standing.

Bribes do not have to be received by the person with the decision making power. The

bribe could take the form of a gift or entertainment provided to the decision maker's spouse or other members of their family.

Entertainment is an accepted part of conducting business, and as long as it is reasonable and proportionate, it is not likely to breach the law of the Republic of Uzbekistan "On Combating Corruption" (January 3, 2017). However, entertainment, which is seen as lavish accommodation or hospitality provided to someone other than your client/customer, such as a member of their family, could be in breach of the Act.

No gifts or entertainment must be offered or given to influence another person to perform their function improperly. For example, if a staff member purchases football match tickets for a potential client who has expressed their desire to go to a game and mentions how difficult it is to buy a ticket, this must be investigated as it could well count as bribery.

Expenditure

The compliance officer must authorise any expenditure on gifts or entertainment.

All expenditure must be recorded on the Gifts and entertainment against the relevant client. The purpose of the activity/expenditure must also be recorded when recording the expenditure.

The maximum expenditure on business development for any individual client (whether a company or an individual) must not exceed (enter the amount here) in a financial year without prior approval of a partner or board member.

Suspicious of bribery

If you are asked to pay a bribe or suspect that a gift or hospitality is intended to be a bribe, you should refer to the reporting procedure and report to the Compliance officer.



CODE OF CONDUCT
Bribery Whistleblowing Policy

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Example	Verdict	What to do
A potential contractor purchases VIP tickets for you and your tickets to see a live show	Inappropriate	Because the host will not be joining you, this looks suspicious and you should politely refuse the gift
Your supervisor asks you to book a table at a lavish restaurant for you, him and a client to discuss feedback on our services	Appropriate if approved	You can go ahead and book the table because the person purchasing the ticket will be present and the subject is already a client. Unusually expenses shall not be approved by the Secretariat.
A firm reimburses you for a plane ticket to Kazakhstan to give a talk at a conference	Appropriate	This is normal behaviour providing the ticket <u>was not unusually expensive</u> , so no action is required
A member mentions in a meeting that he/she recently made a large donation to the political party on behalf of the Association	Inappropriate	Report this to the Compliance officer as the donation could be a bribe
Airport officer is asking you to give him cash, so that you pass the border faster	Inappropriate	This action should be immediately reported to Airport officials and Internal Affairs Unit at the airport
Government official invited you unofficially for dinner to discuss EUROUZ matters	Appropriate	This should be reported to Governing Board to get authorisation to discuss EUROUZ matters. If invitation was received on a short notice, you shall pay the bills for your part of the dinner and inform Compliance officer with providing relevant receipts.
You are invited to wedding/other family event by government official/contractor	Appropriate	Inform Compliance officer. Your gift shall not exceed allowed threshold.
You invited government official/contractor to your wedding/other family event and government official/contractor present exceeded allowed threshold	Inappropriate	Refuse to take the present. Inform Compliance officer. If government official/contractor refuse to take back the present, it shall be donated by the decision of Governing Board. It shall not be used by EUROUZ.
You were not allowed to pass by border control officer in a remote international border. Border	Appropriate with certain conditions	Only if life of our member is under threat and there are no ways to contact EUROUZ members or appropriate government officials, it



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control officer is refusing to allow you to pass the border without a bribe. You are late for your event/meeting and you pay the amount required.

is allowed to pay required sum. Regardless of the sum/event/country/authority, member shall report such incidents to Compliance officer with names, dates, time and other incident details. It is of the utmost importance, that life and health of our members are not under threat. Otherwise, bribe shall be inappropriate.

Reporting Procedure

Any member of staff who is suspicious that a transaction may involve money laundering or bribery, or becomes aware in the course of their work that someone else is interested in money laundering or bribery, must disclose to the Compliance Officer.

The compliance officer will then decide what is to be done as a result of the report, e.g. whether a Suspicious Activity Report needs to be made to the National Crime Agency or further enquiries made, and record their decision and the reasons for it. The reporting member of staff concerned must be informed of the decision and its reasons.

The compliance officer will keep any paper file or e-files for each matter.

To avoid the risk of tipping off, there must be no record on the client file which refers in any way to suspicious circumstances reporting, money laundering, etc.