

ANTI-CORRUPTION POLICY

The «Anti-Corruption Policy» (hereinafter referred to as the «Policy») reflects the commitment of «Arassa Deniz» IE (hereinafter referred to as the «IE») and the IE's Management to high ethical standards and principles of transparent information disclosure regarding professional services provided, as well as the IE's pursuit of improving corporate culture, following best corporate governance practices, and maintaining the IE's business reputation at the highest level.

The IE Management undertakes to comply with this «Policy», communicate it to all IE employees, update it on a regular basis, and ensure its availability to all Stakeholders.

The IE's anti-corruption measures are aimed at:

- **Systemic Prevention:** Preventing corruption by identifying and eliminating the root causes and conditions that contribute to corruption risks.
- **Protection of Staff and Management:** Minimizing the risks of involving IE employees, regardless of their position or status, in corrupt activities or suspicious financial schemes.
- **Effective Counteraction:** Timely detection, suppression, and internal investigation of any corruption offenses, as well as the inevitability of liability for them.
- **Fostering a Culture of Integrity:** Creating an atmosphere within the IE of absolute zero tolerance toward corruption in any form (kickbacks, bribery, or the use of official position for personal gain).

1. General Provisions

1.1. All employees of the IE, regardless of their position, must comply with the norms of national anti-corruption legislation, established, among others, by the Criminal Code of Turkmenistan, the Administrative Offenses Code of Turkmenistan, the Law «On Combating Corruption», this «Policy», and other normative acts. The fundamental requirements of these acts are the prohibition of giving bribes, the prohibition of receiving bribes, the prohibition of commercial bribery, and the prohibition of mediation in bribery.

1.2. All employees of the IE, regardless of their position, are strictly prohibited, directly or indirectly, personally or through the mediation of third parties, from participating in corrupt acts, offering, giving, promising, requesting, or receiving bribes, or making payments to facilitate administrative, bureaucratic, or other formalities in any form. This includes, but is not limited to, payments in the form of cash, valuables, gifts, services, or other benefits, to or from any individuals or organizations, including commercial organizations, government and local authorities, public officials, private companies, and their representatives.

1.3. The IE strives to maintain business and partnership relations with all interested Parties that support the requirements of anti-corruption legislation and/or interested Parties that declare their rejection of corruption.

1.4. The IE makes reasonable efforts to minimize the risk of business relationships with interested Parties that may be involved in corrupt activities. The IE welcomes the readiness of interested Parties to comply with the requirements of this «Policy», to include anti-corruption clauses (provisions) in contracts, and to provide mutual assistance for ethical business conduct and the prevention of corruption.

2. Interaction with IE Employees

2.1. The IE requires its employees to comply with this «Policy».

2.2. The IE provides secure, confidential, and accessible means of informing the IE Management (written statement addressed to the General Director or personal appeal, telephone communication, email, hotline) regarding facts of bribery by persons providing services in the interests of the commercial organization or on its behalf, in accordance with the «Procedure for informing the employer of corruption-related offenses

discovered by an employee». The General Director of the IE may receive proposals for improving anti-corruption measures and controls, as well as inquiries from IE employees and third parties.

2.3. To foster an appropriate level of anti-corruption culture, periodic information events are conducted for IE employees.

2.4. Compliance by IE employees with the principles and requirements of this «Policy» is taken into account when imposing disciplinary sanctions.

2.5. The following duties of employees related to the prevention and countering of corruption are established within the IE:

- To refrain from committing and (or) participating in the commission of corruption offenses in the interests or on behalf of the IE;
- To immediately inform the General Director of the IE of cases where an employee is being incited to commit corruption offenses;
- To immediately inform the General Director of any information known to an IE employee regarding cases of corruption offenses committed by other IE employees, interested Parties, or other persons;
- To report to the General Director any potential or actual conflict of interest involving an IE employee.

3. Non-Retaliation and No Sanctions

3.1. The IE declares that no employee will be subject to sanctions (including dismissal, demotion, or deprivation of bonuses) if they reported an alleged fact of corruption or refused to give or receive a bribe, commit commercial bribery, or act as a mediator in bribery, even if such refusal results in the IE's loss of profit or failure to obtain commercial and competitive advantages.

4. Cooperation with Law Enforcement Authorities

4.1. Cooperation with law enforcement authorities is an important indicator of the IE's genuine commitment to the declared anti-corruption standards of conduct. This cooperation may take various forms:

- Reporting cases of corruption offenses discovered within the organization to the relevant law enforcement authorities;
- Providing assistance to authorized representatives of regulatory and law enforcement bodies during inspections of the enterprise's activities regarding the prevention and countering of corruption;
- Providing assistance to authorized representatives of law enforcement bodies during activities to suppress or investigate corruption crimes, including operational search activities;
- All employees of the IE, regardless of their position, must not allow interference with the performance of official duties by officials of judicial or law enforcement authorities.

5. Procedure for Liability for Non-Compliance (Improper Compliance) with the «Policy»

5.1. All employees of the IE, regardless of their position, are liable under the current legislation of Turkmenistan for compliance with the principles and requirements of this «Policy», as well as for the acts (omissions) of their subordinates that violate these principles and requirements.

5.2. Persons guilty of violating the requirements of this «Policy» may be subject to disciplinary, administrative, civil, or criminal liability at the initiative of the IE, law enforcement authorities, or other persons in the manner and on the grounds provided for by the legislation of Turkmenistan, local regulations, and labor contracts.

General Director
«Arassa Deniz» IE
(title)

M. Shvydko
(name)



November 10, 2025
(date)