



Juru

CODE OF CONDUCT

Foreword

Dear Reader,

Founded in 2015 by me, Juru is a leading international consultancy and engineering firm in Central Asia and the Caucasus with a mission to promote sustainable development. We are a team of experienced specialists with deep expertise in the region, including advisors, engineers, analysts, designers, and project managers and have worked on a variety of projects in the energy, infrastructure, utilities, buildings & cities, and industrial sectors. We aim to be a trusted advisor to our clients and dedicated ourselves to providing with reliable services performed in line with the highest ethical standards.

This Code of Conduct (the Code) covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide our employees, business partners, clients and other stakeholders. The Code reflects our corporate values, outlines our collective intentions with respect to how we conduct our business activities and addresses important laws and policies that apply to our day-to-day interactions with key stakeholders. All of our employees must conduct themselves accordingly and seek to avoid even the appearance of improper behaviour. The Code should also be provided to and followed by Juru's associates, agents, representatives, and contractors. In addition, our policies apply to various operations and our business partners, employees and other stakeholders need to know and follow those policies.

Direct and honest communication and behaviour are critical to the success of our business. By committing to such values and following this Code, we will continue to protect and strengthen our reputation and serve the best interest of our clients and stakeholders. Please, familiarize yourself with the components of this Code as this will help you make the right decisions. I encourage you to contact me directly if you witness any violation of this document.

Sincerely,

Botir Gafurov

Managing Director

Introduction to the Code of Conduct

This Code is a guide for making ethical decisions in complex situations. It provides information and resources to help us comply with laws and regulations that affect our business. Our conduct is the foundation of our reputation, and our individual decisions help us to maintain the trust we have built with our clients and other stakeholders. Juru (the Company or the Firm) encourages reporting of violations and protects whistle-blowers.

Our Principles

We follow the highest standards of integrity, quality, environmental care and social responsibility. Our objective is to ensure high personal and professional standards for our personnel and management, which is achieved through careful selection, ongoing professional development, and adherence to this Code. We apply these principles to all of our activities, including tenders, competitive processes, and dealing with partners, experts, donors, and stakeholders.

Providing Consistent, Quality Services

We compete fairly and honestly, without resorting to unethical or manipulative practices. We provide truthful and factual information about our firm and services. Our goal is to deliver high-quality services and be a trusted technology and engineering partner. We only accept contracts in areas where we have expertise and experience, and where we can meet our clients' requirements expertly and efficiently. We set high standards for expertise, professionalism, and quality, and strive for continuous improvement.

Complying with our Code, Laws, and Regulations

We conduct business in a number of countries around the world. As an international organization, we know and follow the laws and regulations that apply to our work in all locations where we operate. Because we are a company based in the United Kingdom, the United Kingdom laws govern our business operations and conduct. However, the international reach of our business means we are subject to the laws of other countries as well. We will use all reasonable means to prevent and immediately halt the occurrence of conduct that violates our Code. Anyone who directly or indirectly performs, facilitates, condones or approves of any illegal or unethical conduct will be subject to disciplinary measures, consistent with applicable laws and regulations.

Conflict of Interest

A conflict of interest occurs when an employee's private interests interfere, or appear to interfere, with the interests of the Company. Examples of conflicts of interest include, but are not limited to:

- **Financial Interests:** Any financial interest that conflicts with the interests of the Company, including owning or having an interest in a competitor, supplier, or customer of the Firm.
- **Gifts and Favours:** Accepting or providing gifts or favours that influence or appear to influence business decisions.
- **Employment and Consulting:** Accepting employment or consulting work outside of Juru that interferes with the employee's ability to perform their job duties, or that involves a competitor, supplier, or customer of the Firm.
- **Family and Personal Relationships:** Conducting business with, or taking action that benefits, a family member, friend, or acquaintance that could reasonably be perceived as creating a conflict of interest.

Juru takes conflicts of interest seriously and expects employees to conduct themselves with integrity and avoid any situation that could create a conflict of interest. Employees must disclose any actual or potential conflicts of interest to their team/business unit head or the HR team. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment. Conflict of interest is prohibited as a matter of Firm's policy, except as appropriately disclosed, managed, mitigated and finally, if justified, approved by the COO or the Managing Director.

Discrimination and Harassment

The diversity of Juru's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, colour, religion, gender, national origin or any other protected class. Discrimination and harassment have no place in our workplace, and we are committed to ensuring a safe and respectful environment for all employees. Our policy is to provide guidance and support to employees who experience or witness such behaviour, and we encourage everyone to speak up if they encounter discrimination or harassment.

Health, Safety and Security

We strive to provide each employee with a safe, healthy and secure working environment. Each employee has responsibility for maintaining a safe, healthy and secure workplace for all employees by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behaviour are not permitted.

Environment

We expect our employees, partners and other stakeholders to follow all applicable environmental laws and regulations. We demonstrate our dedication to the communities where we work by considering the environment in all of our business activities. We aim to act as environmental stewards when conducting business on company's behalf. This means that we must comply with all applicable environmental laws and regulations, as well as any guidelines set forth by the Firm. We show our respect for the environment by striving to minimize any environmental hazards, conserve and protect natural resources, and manage our use of energy and other resources responsibly.

Confidentiality

Maintaining the confidentiality of proprietary information is essential to protect the interests of the Firm, its clients, and business partners. Employees are expected to uphold high standards of confidentiality, both during and after their employment with the firm. Failure to comply may result in disciplinary action, up to and including termination of employment. We take the protection of proprietary information seriously and expect all employees and officers to do the same.

Proprietary information includes any non-public information that may be of value to competitors or harmful to the Firm or its clients or business partners if disclosed. This includes, but is not limited to trade secrets, design documents, client lists, client data, strategic plans, and marketing strategies, trademarks, databases, records, salary information and unpublished financial data.

Anti-Bribery and Corruption Policy

Juru has a well-established reputation for conducting business in an ethical and honest way. Bribery and corruption are morally wrong and could seriously damage company's reputation. We will apply "zero tolerance" approach to acts of bribery and corruption by any of our directors, officers, employees, consultants, contractors, or third-party representatives.

This policy prohibits to:

- a) give, promise to give, or offer, a payment, gift or hospitality to a third party or otherwise engage in or permit a bribery offence to occur, with the expectation or hope that an advantage in business will be received, or to reward a business advantage already given;
- b) accept a payment, gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Firm in return;
- c) threaten or retaliate against another employee or worker who has refused to commit a bribery offence or who has raised concerns under this policy;
- d) engage in any activity that might lead to a breach of this policy.

This policy does not prohibit normal and appropriate hospitality (given or received), in this case, the value of gifts should not exceed GBP 80 or equivalent (per year per receipt). Everyone working with the Firm must have primary responsibility for implementing this policy within their areas of responsibility. Non-compliance with the policy may result in criminal or civil penalties which will vary according to the offence. An employee acting in contravention of the policy will also face disciplinary action up to and including dismissal.

Protection and Proper Use of Company Assets

All employees and officers should protect company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on firm's profitability. All company assets are to be used for legitimate business purposes. Any suspected incident of fraud or theft should be immediately reported for investigation. Assets should not be used for non-corporate business or purpose. The obligation of employees and officers to protect the firm's assets includes Firm's proprietary information. Proprietary information includes intellectual property such as commercial secrets, trademarks, and copyrights, as well as business, marketing and service plans, engineering ideas, designs and solutions, databases, inhouse tools and software, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of company policy. It could also be illegal and result in civil or criminal penalties.

Charitable Contributions

We have the power to make a positive difference in the communities where we live and work through our volunteer and charitable activities. While we are encouraged to support our communities by making personal charitable contributions, if you wish to give on behalf of the Firm, you must never do so in an effort to improperly gain or retain a business advantage. You must also obtain all proper approvals prior to making a donation on behalf of the Firm.

Reporting any Illegal or Unethical Behaviour

Our clients, partners, contractors, experts and other stakeholders are encouraged to report about situations which they believe may be illegal or a violation of this Code of Conduct or any other company policy or when in doubt about the best course of action in a particular situation. Such reports should be addressed for the purpose of reviewing compliance and further investigations to our Managing Director, who acts independently and autonomously. The confidentiality of provided information will be ensured.

Juru

Contact Us

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