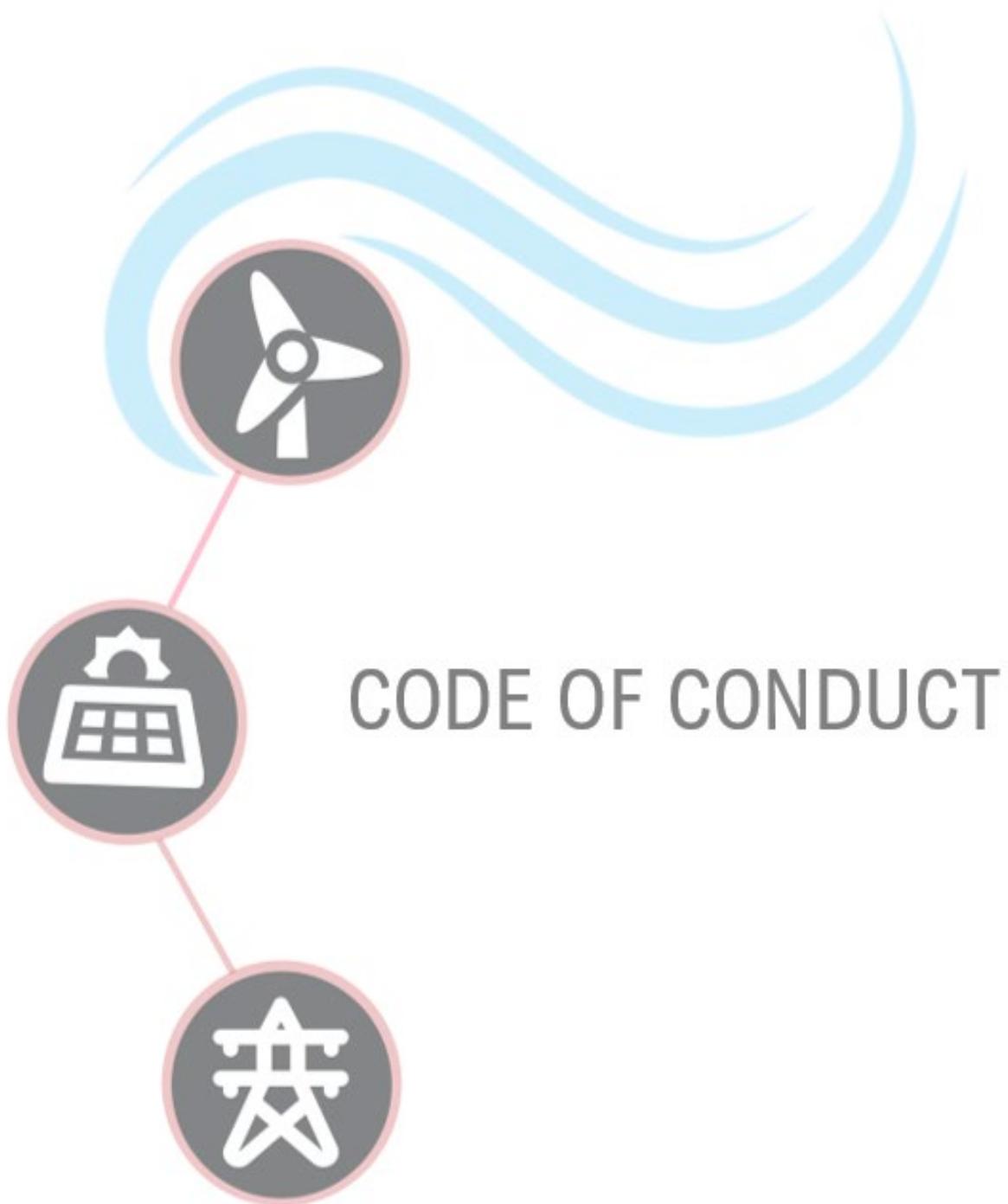


# Juru Energy



Passion. Performance. People.

Dear all,

Since its foundation in 2015, Juru Energy went from strength to strength and grew into a leading engineering consultancy in the Central Asia region with unique indigenous capabilities for the region. We thrive to be a trusted advisor to our clients and dedicated ourselves to providing with reliable energy consultancy services performed in accordance with the highest ethical standards.

Juru Energy's Code of Conduct 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 all employees, business partners, our clients and other stakeholders. This 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 behavior. The Code should also be provided to and followed by Juru Energy'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 behavior 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 violations of this document.

Sincerely,

Botir Gafurov

Managing Director  
Juru Energy Limited

## INTRODUCTION TO THE CODE OF CONDUCT

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This Code is a guide for making sound decisions in complex situations. It provides information, support and resources to help us act ethically and comply with the laws and regulations that affect our business. Our conduct is the foundation of our reputation, and our individual business decisions help us to maintain the trust we have built with our clients and other stakeholders. Our company also encourages to report violations that we observe. This is an important dimension of accountability.

## OUR PRINCIPLES

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The Code of Conduct reflects the company's objectives, mission and common corporate values. In all of company's activities, we abide by principles of integrity, quality, and social responsibility. Juru Energy follow highest corporate ethics and fair competitive practices when we participate in tenders and competitive processes. At Juru, we believe that ensuring high personal and professional standards for the personnel and management is very important. This is achieved by:

- Careful selection of office staff, heads of departments and management, external contractors and partners;
- Requiring our personnel to take all reasonable steps to maintain and develop their professional competence, to keep records to demonstrate their ongoing development as appropriate;
- Ensuring compliance with the Code of Conduct;
- Adhering to the Code when dealing with partners, local and international experts, donors and all stakeholders in projects that the firm undertakes.

## PROVIDING CONSISTENT, QUALITY SERVICES

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At Juru Energy, we compete effectively and with enthusiasm. There is no room for unfair or unethical business practices in what we do. We are honest in all of our marketing and business pursuits. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or any other intentional unfair practices. We make only factual and truthful statements about the firm and the services we offer.

We aim to provide uncompromised support during various stages of project development and implementation of a high-quality power project and be a technology & engineering partner our clients can trust. For each technology and engineering discipline, we use industry leading, state-of-the-art tools and software packages.

We accept contracts only in those sectors in which we have expertise and experience, and in which we are able to meet our clients' requirements expertly and efficiently. When providing our services, we set ourselves high standards in terms of expertise, professionalism and quality, and strive for continuous improvement. We secure the quality of our proposals and our contract execution by adhering to designated procedures and undergoing meticulous checks.

## COMPLYING WITH OUR CODE, LAWS AND REGULATIONS

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Juru Energy conducts its 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.

## CONFLICTS OF INTEREST

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A conflict of interest exists when a person's private interest interferes in any way - or even appears to interfere - with the interests of the firm. A conflicting situation may arise when an employee or officer takes actions or has interests that may make it difficult to perform his or her duty objectively and effectively. Conflicts of interest may also arise when an employee or officer, or a member of his or her family, receives improper personal benefits as a result of his or her position in the firm. Conflict of interest is prohibited as a matter of Juru's policy, except as appropriately disclosed, managed, mitigated and finally, if justified, approved by the Managing Director. Any employee or officer who becomes aware of a conflict or potential conflict should bring it to the attention of supervisor, manager or other appropriate personnel or consult the procedures provided in this Code.

## CORPORATE OPPORTUNITIES

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Employees and officers are prohibited from taking for themselves opportunities that are discovered through the use of corporate property, information or position without the consent of the Managing Director. No employee or officer may use corporate property, information, or position for personal gain, and no employee or officer may compete with the firm directly or indirectly. Employees and officers owe a duty to advance the Juru's interests when the opportunity to do so arises.

## DISCRIMINATION AND HARASSMENT

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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. For further information you should consult the appropriate firm policy.

## HEALTH, SAFETY AND SECURITY

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Juru Energy strives 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

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Juru Energy expects its 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.

## RECORD-KEEPING, FINANCIAL CONTROLS AND DISCLOSURES

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Juru Energy requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions. All business expense accounts must be documented and recorded accurately in a timely manner. All of Juru's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the company's transactions, must be promptly disclosed in accordance with any

applicable laws or regulations and must conform both to applicable legal requirements and to Juru's system of internal controls. Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to e-mail, internal memos, and formal reports. Records should always be retained or destroyed according to firm's record retention policies.

## CONFIDENTIALITY

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Employees and officers must maintain the confidentiality of proprietary information entrusted to them by the firm or its client or business partners, except when disclosure is authorized in writing by the Managing Director or required by laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to Juru or its client or business partners if disclosed. It includes information that our clients or business partners have entrusted to us. The obligation to preserve proprietary information continues even after employment ends.

## ANTI-BRIBERY AND CURRUPTION POLICY

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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

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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-Juru Energy business or purpose. The obligation of employees and officers to protect the firm's assets includes Juru's proprietary information. Proprietary information includes intellectual property such as commercial secrets, patents, 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

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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 Juru Energy, 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

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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 Juru Energy 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 ([b.gafurov@juruenergy.com](mailto:b.gafurov@juruenergy.com)), who acts independently and autonomously. The confidentiality of provided information will be ensured.

# Juru Energy

## Headquarters

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