


**Approved**  
**By the resolution of the Board of**  
**JSC «NC «QazaqGaz»**  
**№ 24 from 28 August 2023**

**POLICY**  
**FOR THE PROTECTION OF HUMAN RIGHTS IN JSC «NC «QAZAQGAZ»**  
**AND ITS SUBSIDIARIES AND AFFAIRS**

Instance


**Astana city 2023**

 <p>QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ</p>	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
Edition: No. 1 Id. code: P-21-23	Policy for the protection of human rights in JSC "NC "QazaqGaz" and its subsidiaries and affiliates	Page 2 from 8

## Foreword


**Introduced:** first time.

**Revision date:** 2028.

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## 1. Purpose and scope

1.1. This Policy for the protection of human rights in JSC «NC «QazaqGaz» (hereinafter - Company) and its subsidiaries and affiliates (hereinafter - SAA, or collectively referred to as the Group of Companies) is based on generally recognized laws and principles for the observance of human rights.

1.2. The Society's Boards assume responsibility for respecting the human rights of all with whom they interact, whether employees or third parties, in accordance with the UN Guiding Principles on Business and Human Rights (2011), the OECD Guidelines for Multinational Enterprises (2011), the Universal Declaration of Human Rights (1948), the International Labor Organization Declaration on Fundamental Principles and Rights at Work (1998).

1.3. Society respects human rights. Respect for human rights is a fundamental element of sustainable development of the Company and the Group of Companies. The Society works to identify, prevent and mitigate potential negative human rights impacts.

1.4. This Policy is intended to establish minimum requirements for detecting, preventing and monitoring potential human rights violations related to the activities of the Company and the Group of Companies.

1.5. The purpose of this Higher Level Policy is to set out the purpose, direction, principles and ground rules for the enforcement of human rights.

1.6. The provisions of the Policy are binding on all employees of the Company and the Group of Companies.

1.7. The reference to «you», «we», «us» or «everyone» in this Policy means an appeal to all employees of the Company and the Group of Companies.

## 2. Regulatory references

The Policy uses links to the following regulatory documents:

- 2011 - UN Guiding Principles on Business and Human Rights;
- 2011 - OECD Guidelines for Multinational Enterprises;
- 1948 - Universal Declaration of Human Rights;
- 1998 - Declaration of the International Labor Organization on Fundamental Principles and Rights at Work;
- Code of Business Ethics of JSC «NC «QazaqGaz»;
- DP-01 - General requirements for the development, execution and presentation of internal regulatory documents of JSC «NC «QazaqGaz»;
- DP-02 - Documentation management;
- DP-03 - Records management.

## 3. Terms and Definitions

3.1. This Policy uses the terms and their respective definitions in accordance with Table 1.


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Table 1. Terms and definitions

Terms	Definitions
Equality	Commitment to ensuring consistent and systematic fair and equitable treatment for all employees.

#### 4. Abbreviations and symbols

4.1. In this Policy, the following symbols and abbreviations are used in accordance with Table 2.

Table 2. Abbreviations and symbols

No. p / n	Symbols and abbreviations	Explanation of the given abbreviations and symbols
1.	Company	Joint Stock Company "NC "QazaqGaz"
2.	IRD	Internal regulations
3.	RSU IMS	Responsible structural unit, whose functions include IMS
4.	DMHRaLP	Responsible structural unit, whose functions include human resource management.

#### 5. Responsibility and authority

5.1. The Board of Directors and the Management Board of the Company are responsible for providing all necessary resources for the implementation of this Policy.

5.2. The managers and employees of the Company and the Group of Companies are responsible for the unconditional full fulfillment of their obligations to respect human rights.

5.3. The obligations of the Company expressed in this Policy are the basis for setting goals in the field of human rights protection, apply to employees of the Company and the Group of Companies, contractors and are included in the system of business relations of the Company with partners.

Responsibility for the development of this Policy in accordance with the requirements of the documented procedure DP-01 «General requirements for the content, presentation and execution of the Company's internal regulatory documents» is borne by the DMHRaLP.

5.4. The responsibility for the management of this Policy in accordance with the requirements of the documented procedure DP-02 «Document Management» lies with the RSU IMS.


#### 6. Key principles and approaches for the implementation of the Policy

6.1. The policy is based on the following principles:

*Respect for human rights:* Society recognizes the importance of respecting and observing fundamental human rights.

The Company ensures observance of human rights set forth in the Constitution of the Republic of Kazakhstan and in the current legislation of the Republic of Kazakhstan.

*The value of diversity:* we value the diversity of the people we work with and their contribution to the Society. The principle of providing equal opportunities and intolerance to discrimination and harassment is being implemented at all levels of the Company and the Group of Companies. We are committed to maintaining workplaces free of discrimination and harassment based on race, gender, color, national or social origin and status, religion, age, disability, marital status, or any other status.

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*Human Rights Awareness:* PR raising awareness among internal and external stakeholders of key human rights principles. The Society undertakes to bring the policy on the protection of human rights to the attention of all interested parties.

*Workers' rights:* The Company undertakes to provide a safe and healthy working environment for its employees in all regions where it operates. The Company will implement the highest standards and procedures in the field of health and safety. The Company seeks to provide its employees with a decent remuneration that allows them to satisfy their basic needs and the needs of their families in all regions in which the Company operates.

*Openness to feedback:* With building and maintaining comprehensive feedback mechanisms that allow stakeholders to report any issues or concerns anonymously without fear of stigma or retaliation.

*Response to violations:* to each employee of the Company can inform the immediate supervisor, representatives of structural divisions for ensuring corporate security, human resource management through the proactive informing line (“hot line”), in accordance with the Rules for proactive informing the Company or the “hot line” proactive informing the Nysana Call Center or apply to the relevant authorized bodies of the Republic of Kazakhstan.

*Freedom of Association:* The Company strictly observes the rights of employees to freedom of association and the conclusion of collective agreements. Trade unions operate within the Group of Companies, and collective agreements are concluded with employees.

6.2. The Company strives to promote the observance and protection of the rights of everyone with whom the Company interacts and assumes the following obligations:

- monitor the observance of human rights and report on the impact of the Company that affects human rights;
- communicate the policy to interested parties (including staff and suppliers);
- implement programs aimed at the observance and protection of human rights;
- compensate for the damage.

## **7. Recordings**

7.1. There are no records in this Policy that must be managed in accordance with the requirements of the documented procedure DP-03 «Records Management».

## **8. Revision, modification, storage and distribution**

8.1. The Policy is reviewed as necessary, but at least once every three years by the Management Board of the Company for its relevance and compliance with applicable standards and practices.

8.2. Revision, modification, storage and distribution of this Policy are carried out in accordance with the requirements of the documented procedure DP-02 «Documentation Management».

8.3. The «original» in paper form of this documented procedure is drawn up and stored in the Company's RSU IMS.

8.4. A scanned version of this documented procedure is posted on the Company's Internet portal.



