
 QAZAQGAZ НАЦИОНАЛЬНАЯ КОМПАНИЯ	JOINT STOCK COMPANY «NC» QazaqGaz» Integrated management system	
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Approved **АКЦИОНЕРНОГО**
 By the resolution of the Board of
 Directors
 JSC «NC «QazaqGaz»
 Protocol No. _____
 from « » _____ 2023



**ANTI-CORRUPTION
 POLICY OF
 JSC «NC «QAZAQGAZ»**

Instance: _____

Astana city 2023


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Entered: Instead of document P-06-21 “Anti-Corruption Policy of JSC KazTransGas” approved by the resolution of the Board of Directors of JSC KazTransGas dated August 20, 2021 (Protocol No. 7, clause 4)

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1. Purpose and scope

1.1. This Anti-Corruption Policy of JSC NC QazaqGaz (hereinafter - Policy) has been developed in accordance with the Law of the Republic of Kazakhstan “On Combating Corruption”, other legislative acts of the Republic of Kazakhstan in the field of combating corruption, the Code of Business Ethics, as well as internal regulatory documents governing the activities of JSC NC QazaqGaz (hereinafter - Company).

1.2. The policy sets out:

- 1) the basic principles of combating corruption in the Company;
- 2) managerial and organizational bases for the prevention of corruption offenses;
- 3) measures to minimize the prevention of acts of corruption;
- 4) the procedure for conducting compliance checks/investigations of violation facts;
- 5) the basis for the formation of employees' commitment to strict observance of the legislative acts of the Republic of Kazakhstan, as well as internal regulatory documents governing the activities of the Company;

- 6) the general principles of accepting, giving gifts, providing and accepting acts of hospitality in the Company, as well as the activities of the structural divisions of the Company while registering gifts and showing acts of hospitality.

1.3. The main purpose of this Policy is the commitment of officials and employees of the Company to high standards of conduct, conduct of open and honest business, strengthening business reputation and increasing confidence in the group of companies of the Company.

1.4. This Policy is mandatory for familiarization and strict observance by all associates, officials and employees of the Company (including outstaffing).

1.5. The Company recommends to its counterparties adhere to the requirements of this Policy and all appendices and ensure compliance with the requirements of the Policy by their employees.

1.6. Application of the Policy in the SA of the Company may be carried out in the prescribed manner by developing and approving analogous policies or bringing internal documents of the SA of the Company in line with this Policy. At the same time, the requirements provided for by this Policy in similar policies and internal documents of the Company's SA should not be reduced.

1.7. In case, if the laws of the countries where SA are located and internal regulations of SA establish more stringent requirements than the provisions of the Policy, then the provisions of internal regulations of SA or legal requirements shall apply.

1.8. This Policy shall be posted on the corporate website of the Company.

2. Regulatory references

2.1. This Policy of the Company provides links to the following legal acts and internal regulatory documents:

- Criminal Code of the Republic of Kazakhstan dated July 3, 2014 No. 226-V
- Law of the Republic of Kazakhstan dated November 18, 2015 No. 410-V "On Combating Corruption";
- Law of the Republic of Kazakhstan dated May 13, 2003 No. 415-II "On Joint Stock Companies";
- Corporate standard for the compliance function in portfolio companies of JSC JSC Samruk-Kazyna, approved by the decision of the Management Board of JSC Samruk-Kazyna dated June 30, 2022 (Protocol No. 36/22);
- Code of Business Ethics of the Company;

- Regulations on the Compliance Service of the Company, approved by the decision of the Board of Directors of the Company dated April 12, 2022 No. 8;
- Rules for due diligence of the Company's counterparties;
- Standard for managing the procurement activities of the JSC "SWF Samruk-Kazyna" and organizations fifty or more percent of the voting shares (participatory interests) of which are directly or indirectly owned by JSC Samruk-Kazyna on the right of ownership or trust management;
- General requirements for the development, registration and exposition of internal regulatory documents of the Company;
- Management of documentation;
- Management of records.


3. Terms and Definitions

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

Table 1. Terms and definitions

Terms	Definitions
Administrative and economic functions	Provided in the manner prescribed by the law of the Republic of Kazakhstan and the internal documents of the Company, the right to manage and dispose of property on the balance of the Company;
Anti-corruption legislation	The Law of the Republic of Kazakhstan "On Combating Corruption and other regulatory legal acts on issues of combating corruption
Anti-corruption monitoring	The activities of the Company in collecting, processing, summarizing, analyzing and evaluating information regarding the effectiveness of the anti-corruption policy, the state of law enforcement practice in the field of combating corruption, as well as the perception and assessment of the level of corruption in the Company.
Anti-corruption restrictions	Restrictions established by the Law of the Republic of Kazakhstan "On Combating Corruption" and aimed at preventing corruption offenses;
Associates	Members of the Board of Directors, the Management Board of the Company, agents, partners in joint ventures and other persons providing services for the Company or acting on its behalf;
Close relatives	Parents (parent), children, adoptive parents, adopted, full and half brothers and sisters, grandfather, grandmother, grandchildren;
Internal analysis of corruption risks	The activities of the Company to identify and study the causes that contribute to the commission of corruption offenses;
Officials	Members of the Board of Directors, the Management Board of the Company, and other persons in the Company equated to persons authorized to perform public functions in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption" and this Policy;
Persons equated to persons authorized to perform state functions	A person performing managerial functions in the Company, a person authorized to make decisions on the organization and conduct of procurement, including public procurement, or responsible for the selection and implementation of projects financed from the state budget and the National Fund of the

	Republic of Kazakhstan, holding a position not lower than the head of an independent structural unit;
Person in charge	A person who permanently, temporarily or by special authority performs organizational and administrative or administrative and economic functions in the Company;
Financial reward	Material values, benefit or advantage transferred to or received from third parties;
Compliance system or anti-corruption system	A set of interrelated elements of the internal control system, policies, procedures, processes and measures taken by the Company to achieve anti-corruption goals, as well as a set of preventive measures and preventive actions to prevent violations of anti-corruption laws, the requirements of the Company's regulatory documents in order to ensure high professional and ethical standards, minimize the risks of non-compliance with the law and prevent significant financial loss or loss of reputation;
Conflict of interests	A contradiction between the personal interests of officials, persons equated to persons authorized to perform state functions, persons performing managerial functions, employees and their official powers, in which the personal interests of these persons may lead to non-performance and (or) improper performance of their official duties;
Corruption	Illegal use by officials of the Company of their job (official) powers and related opportunities in order to obtain or extract personally or through intermediaries property (non-property) benefits and advantages for themselves or third parties, as well as bribery of these persons by providing benefits and advantages;
Corruption risk	The possibility of occurrence of causes and conditions conducive to the commission of corruption offenses;
Corruptional actions	Intentional act (action or inaction) committed by an official, employee of the Company, using his official position in order to obtain benefits in the form of property or other benefits;
Corruption offenses	An unlawful guilty act (action or inaction) that has signs of corruption, for which administrative or criminal liability is established by law;
Counterparty	An individual or legal entity with whom the Company has concluded or plans to conclude an agreement;
Organizational and administrative functions	The right granted in accordance with the procedure established by the law of the Republic of Kazakhstan and the internal documents of the Company to issue orders and instructions that are binding on employees, as well as to apply incentives and disciplinary sanctions against employees;
Anti-corruption	The activities of the Company and its officials and employees within their powers to prevent corruption, including the formation of an anti-corruption culture, identify and eliminate the causes and conditions that contribute to the commission of corruption offenses, as well as identify, suppress corruption offenses and eliminate their consequences;

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Hospitality expenses	Expenses for holding receptions, for attending cultural and entertainment events, for buffet service, for paying for the services of an interpreter, and so on;
Worker	A person who has an employment relationship with the Company and directly performs work under an employment contract, as well as other persons involved under civil law contracts to perform work;
Compliance service	A structural subdivision of the Company that performs the functions of anti-corruption compliance in accordance with the legislation of the Republic of Kazakhstan on combating corruption, the Corporate Standard for the compliance function in portfolio companies of JSC Samruk-Kazyna and internal documents of the Company;
Associates	full and half brothers and sisters, parents and children of the spouse (spouses)

4. Abbreviations and symbols

4.1. This Policy uses abbreviations and designations in accordance with Table 2.

Table 2. Abbreviations and symbols

No. p / n	Symbols and abbreviations	The full name of the given designations and abbreviations
1	subsidiaries and affiliates (SA)	Subsidiaries and affiliates, including jointly controlled organizations and joint ventures of JSC NC QazaqGaz
2	DHRMC	Department of Human Resource Management and Compensation
3	Society	JSC NC QazaqGaz
4	EDS	Electronic document system in JSC NC QazaqGaz

5. Responsibility and authority

5.1. The Head of the Compliance Service is responsible for the development of this Policy in accordance with the requirements of the documented procedure DR-01 "General requirements for the content, presentation and execution of the Company's internal regulatory documents".

5.2. The Head of the Compliance Service is responsible for managing this Policy in accordance with the requirements of the documented procedure DR-02 "Management OF Documentation".

5.3. Responsibility for fulfilling the requirements of this Policy rests with the officers and employees of the Company.


5.4. Responsibility for the distribution of this Policy rests with one of the employees of the Compliance Service of the Company.

6. Main part

6.1. Main principles of combating corruption

6.1.1. The main principles of combating corruption in the Company are:

1) **zero tolerance for any manifestations of corruption** - the Company adheres to the complete rejection of corruption in any form and manifestation in the course of its activities.

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The principle of zero tolerance for any manifestations of corruption means a strict prohibition for associates, officials and employees acting on behalf of the Company or in its interests, directly or indirectly, personally or through any mediation, to engage in corrupt practices, regardless of business practices in a particular country;

2) **the commitment of top management and the establishment of a "tone from above"** - the Board of Directors of the Company plays a key role in shaping a culture of intolerance towards corruption. Members of the Board of Directors and the Management Board of the Company openly and constantly declare their irreconcilable attitude to any form of manifestation of corruption and at all levels, demonstrate, observe and implement this principle by personal example;

3) **involvement of officials and employees** - the Company informs its officials and employees about the provisions of anti-corruption legislation and welcomes their active participation in the formation and implementation of anti-corruption standards and procedures, the development of an anti-corruption culture, as well as the adoption by officials of the anti-corruption restrictions provided for by the legislation of the Republic of Kazakhstan;

4) **the inevitability of punishment** - the Company declares the inevitability of punishment of officials and employees of the Company, regardless of their position, length of service and other conditions, in case they commit corruption offenses, corrupt actions in the performance of their duties, as well as failure to comply with the internal documents of the Company on combating corruption, including, but not limited to, records and memos of the Compliance Service;

5) **legality and compliance of this Policy with the current legislation and generally accepted standards** - the Company strictly complies with the anti-corruption legislation of the Republic of Kazakhstan and other countries in which it conducts or plans to conduct business, and any of its actions or inaction does not contradict the applicable anti-corruption laws;

6) **proportionality of procedures for preventing and combating corruption** - the Company develops and implements control procedures to reduce the likelihood of involvement of the Company, its associates, officials, and employees in corruption activities, in proportion to the corruption risks that may arise in the activities of the Company;

7) **effectiveness of anti-corruption procedures** - the Company strives to make the procedures as transparent, clear, feasible as possible, which ensure the simplicity of their implementation and obtaining a significant result. The Company evaluates the effectiveness of existing control procedures and improves them in case of inefficiency;

8) **monitoring and control** - the Company monitors the state of corruption risks, controls compliance with the implemented procedures for preventing and combating corruption and their effectiveness;

9) **prevention of conflicts of interest** - the Company believes that the officials and employees of the Company should not directly or indirectly influence decision-making in the Company in the event of a conflict of interest with the interests of the Company;

10) **due diligence** - the Company exercises due diligence in the event of the emergence / continuation of business relations with contractors, job candidates or other third parties, carrying out timely verification of their reliability and the absence of a conflict of interest;

11) **leadership and coordination** - the Company ensures interaction and cooperation in the field of anti-corruption activities with state bodies and associates / third parties of the Company, as well as coordination of actions in the process of combating corruption.

6.2. Assessment of corruption risks

6.2.1. The Company, in accordance with the law, conducts an internal assessment of corruption risks.

6.2.2. The purpose of identifying and assessing corruption risks is to identify those types of activities and business processes of the Company that are subject to the risks of non-compliance with anti-corruption laws, and where there is a high probability of committing corruption offenses by officials and employees, both for personal gain and for the benefit of the Company. At the same time, the manager in charge of the analyzed business process is responsible for identifying and assessing risks, as well as developing measures to reduce them.

6.2.3. Identification, assessment of corruption risks is carried out on the basis of anti-corruption monitoring and internal analysis of corruption risks.

6.2.4. The purpose of anti-corruption monitoring is to assess law enforcement practice in the field of combating corruption.

6.2.5. Anti-corruption monitoring includes the following measures (but is not limited to):

1) conducting a compliance review of the Company's internal documents and their drafts submitted for approval by the Board of Directors, the Company's Management Board, for the presence of provisions in them that contribute to the creation of causes and conditions for the manifestation of corruption (factors), and the development of proposals for their elimination;

2) monitoring of anti-corruption legislation, as well as anti-corruption legislation of foreign states that influence the activities of the Company in order to promptly bring their internal documents in line with the changing requirements of anti-corruption legislation;

3) study of statistics of appeals of individuals and legal entities, information from non-governmental and international organizations on the facts of corruption manifestations on the part of officials and employees;

4) monitoring of publications in the media and other sources of information not prohibited by law.

6.2.6. The results of anti-corruption monitoring may be the basis for conducting an analysis of corruption risks, as well as improving measures aimed at creating an anti-corruption culture in the Company.

6.2.7. Internal analysis of corruption risks includes:

1) identification of corruption risks, as well as discretionary powers and norms that contribute to the commission of corruption offenses, in regulatory legal acts affecting the activities of the Company, internal documents of the Company;

2) identification of corruption risks in the organizational and managerial activities of the Company;

3) identification of "critical points" of the business process, during the implementation of which the occurrence of corruption offenses is most likely:


4) description of corruption schemes that contain:

- a description of the benefit or advantage that can be obtained by the Company or its individual officials and employees in the event of a corruption offense;

- determination of positions subject to corruption risks, with the formation of their list;

- probable forms of corrupt payments;

5) determination of the presence or absence of internal control procedures, evaluation of the effectiveness of existing control procedures.

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6.2.8. For any corruption scheme, a zero level of risk tolerance is adopted, and in each case the Company immediately develops measures to minimize the risks of corruption identified by the results of internal analysis.

6.2.9. The procedure for identifying and assessing corruption risks, developing measures to minimize them is regulated by the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company.

6.2.10. Based on the results of the process of identification, analysis and assessment of corruption risks, a register is drawn up containing, among other things, information on the sources and situations of a potential corruption violation, as well as control procedures and measures are developed to mitigate significant corruption risks and improve the efficiency of the compliance system. For all identified significant compliance risks, positions (persons) influencing its implementation should be identified.

6.3. Checking counterparties and cooperation with them

6.3.1. During its activities, the Company concludes various agreements and contracts with counterparties, in connection with which, the Company strives to make reasonable efforts to minimize the risk of business relations with counterparties that may be involved in corrupt activities, for which purpose the readiness of counterparties to comply with the requirements of this Policy is checked, and the following additions are included in contracts:

- anti-corruption clauses in the form, in accordance with Appendix No. 4 to this Policy;
- The Supplier's Code in the form, in accordance with Appendix No. 5 to this Policy (applicable to contracts for the procurement of goods, works and services).

6.3.2. The use of the above documents helps to maintain trust between the parties and prevent corruption, both in the conclusion and execution of contracts.

6.3.3. When intending to establish business relations with counterparties, the initiator of the contract and / or other agreement must be guided by the Rules for checking the reliability of the Company's counterparties.

6.3.4. In the event that "risk factors" are identified, the initiator of the contract and / or other agreement must necessarily bring the information to the immediate supervisor for the Company to make an appropriate decision.

6.4. Participation in charitable, sponsorship and political activities

6.4.1. The Company does not finance charitable and sponsorship projects in order to obtain or maintain an advantage in its activities.


6.4.2. The Company, as well as officials and employees, do not finance political parties, public associations in order to obtain or maintain an advantage in its activities.

6.4.3. Officials and employees participating in public associations are prohibited from offering, giving, promising or making payments, contributing property, giving gifts on behalf of the Company in order to obtain or maintain an advantage for the Company in its activities.

6.4.4. Officials and employees are independently responsible in accordance with the current legislation of the Republic of Kazakhstan for participation in public organizations.

6.5. Payment for simplification of formalities

6.5.1. This Policy prohibits the payment or acceptance of payments for simplification of formalities. Facilitation payments means payments made to officials and employees to carry out or

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expedite routine procedures. Facilitation fees are different from statutory service charges, which are publicly available.

6.6. Giving, accepting gifts, other services (signs of attention)

6.6.1. In accordance with the legislation of the Republic of Kazakhstan and the Code of Business Ethics, the Company prohibits officials and employees, as well as family members of these persons, from receiving material remuneration, gifts or services provided for the actions (inaction) of this person in favor of the persons who provided material remuneration, gifts or services, if such actions (inaction) are within the official powers of this person or if the person, by virtue of its official position, can contribute to such actions (inaction).

6.6.2. Gifts and money received without the knowledge of officials and (or) members of their families are subject to gratuitous transfer / send to the authorized state body in accordance with the requirements of anti-corruption legislation.

6.6.3. The Company recognizes the exchange of business gifts (souvenirs) during official meetings and hospitality expenses, including business hospitality, as a necessary part of doing business and as a common business practice. The Society strongly encourages an atmosphere of honesty and transparency regarding business gifts and hospitality expenses.

6.6.4. Hospitality expenses, including for business hospitality of the Company with third parties, must meet the following criteria:

- 1) fully comply with the norms of the legislation of the Republic of Kazakhstan, the Code of Business Ethics and internal regulatory documents of the Company;
- 2) be reasonably justified, proportionate and non-luxury;
- 3) not constitute an implicit reward for a service, action, inaction, connivance, patronage, granting of rights, making a certain decision on a transaction, agreement, license, permit, etc., or an attempt to influence the recipient for any other illegal or unethical purpose;
- 4) hospitality is not intended and cannot be perceived as intended to influence or induce a person to act in a certain way, or to reward that person for the performance of his role or function;
- 5) not create a reputational risk for the Company, officials and employees, as well as other persons, in case of disclosure of information about gifts or entertainment expenses;
- 6) the hospitality is appropriate and does not go beyond the limits of this Policy and does not violate the hospitality policy of the relevant third party.


6.6.5. Any manifestation of hospitality must be carried out in accordance with the legislation of the Republic of Kazakhstan and the internal regulatory documents of the Company;

6.6.6. Offering hospitality and gifts to civil servants, officials of quasi-public sector entities and members of their families is not allowed. It is also not allowed to offer or give gifts if it is known that accepting the gift is unacceptable to the done person.

6.6.7. All expenses for business gifts and business hospitality, as well as advertising expenses, must be carried out strictly in accordance with the approved business plan of the Company. The budget applications of the administrators of such budget programs must be preliminarily approved by the responsible structural subdivision and the management of the Company.

6.6.8. If there is any doubt about the compliance of a business gift or event with the requirements of this Policy, the employee should consult on this issue with the immediate supervisor or responsible structural unit.

6.6.9. Employees and officials of the Company in the performance of their official duties avoid giving and / or accepting gifts and hospitality because such actions will have an improper impact or

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create the appearance of such an impact on employees, officials and business partners of the Company.

6.6.10. When entering into a business relationship, employees are encouraged to familiarize business partners with this Policy. If available, familiarize themselves with a similar internal document adopted by business partners, third parties.

6.6.11. If a gift in the form of cash or cash equivalent is received inadvertently, the employee must notify in writing the head of his department or (in the case of the employee is the head of the department) the Compliance Service and arrange for an immediate return.

6.6.12. The employee must notify in writing to the head of his department or the head in charge of his department (if the employee is the head of the department) in case of accepting an act of hospitality from a third party through negligence:

- 1) meals (food expenses) in the normal course of business relations with third parties;
- 2) a ticket, an invitation (in a company with a third party) to cultural events that seem appropriate and do not go beyond normal business courtesy.

6.6.13. The Compliance Service may conduct a preliminary assessment (gifts, hospitality expenses, hospitality acts, etc.) for compliance with the criteria specified in sections 1-6) of subclause 6.6.4. Policies that will exclude, including cases of accepting an act of hospitality from a third party through negligence.

6.6.14. The actions specified in this section must be registered in the Journal of Gifts and Hospitality Acts, which is maintained by the responsible structural unit of the Company in accordance with Appendix No. 2 to this Policy.

6.6.15. The journal is kept on paper, laced and numbered in order to avoid corrections, blots and erasures.

6.7. Coordination of anti-corruption activities in the SA of the Company

6.7.1. In accordance with the legislation of the Republic of Kazakhstan and the Charter, the Company assumes leadership and coordinates the activities of SA in the field of combating corruption.

6.7.2. If necessary, joint working groups can be created to work on selected issues in the field of combating corruption, as well as conducting compliance checks/investigations.


6.7.3. The Company, as a Shareholder/Participant, annually, through representatives in the Boards of Directors/Supervisory Boards, communicates its position on expectations regarding the measures taken in the field of combating corruption, including the elimination of identified shortcomings, corruption risks, and factors contributing to the commission of corruption offenses.

6.7.4. If necessary, hearings of the first heads of subsidiaries and dependent companies on anti-corruption issues may be held.

6.8. Work with appeals of individuals and legal entities received within the established procedures

6.8.1. In order to prevent and combat corruption, the Company carries out work with appeals from individuals and legal entities received in accordance with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company.

6.8.2. In the Company, in accordance with the established procedure, there is a centralized line of initiative information of JSC Samruk-Kazyna, through which any employee, counterparty or other interested person (applicant) of the group of companies can report the presence of reasonable suspicions and facts known to them of violations by the Company, its officials and employees of

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applicable legal requirements or internal documents, corruption crimes, illegal actions and other violations.

6.8.3. Consideration of applications from individuals and legal entities received as part of initiative informing is carried out in accordance with the internal documents of the Company.

6.9. The procedure for conducting compliance checks and investigations

6.9.1. According to reports of corruption offenses, violations of the Code of Business Ethics, including appeals received through initiative informing, a compliance check or investigation is carried out by decision of the Chairman of the Board of Directors of the Company and / or the Head of the Compliance Service.

6.9.2. Officials and employees have the right to inform the Compliance Service of their suspicions or provide information received from other persons about possible acts of corruption committed by any official or employee, supplier or other parties that have any relation to the Company.

6.9.3. Any person who has reasonable grounds to believe that an unlawful act has been committed should not attempt to independently conduct a verification or investigation, or discuss the information received with other persons.

6.9.4. Compliance check/investigation employees guarantee the confidentiality of information about all officials, employees, as well as other persons (counterparties) who report violations in good faith.

6.9.5. The purpose of inspections and investigations is to determine the circumstances and causes of violation by the Company and/or its SA and employees of the established requirements, including the requirements of the anti-corruption compliance system. As part of an effective investigation mechanism, the root causes of illegal actions and vulnerabilities in the internal control system are identified.

6.9.6. Compliance checks and investigations are carried out by the Compliance Service, if necessary, with the involvement of representatives of the structural divisions of the Company and / or SA with control functions.

6.9.7. Compliance audits and investigations must be free from potential conflicts of interest.

6.9.8. The Compliance Service, when conducting inspections and investigations, has the right to:


- 1) access to any information and materials necessary for the verification/investigation;
- 2) receive written explanations from officials and employees of the Company and SA on the issues of the inspection/investigation being carried out.

In the event that an employee and/or an official, in respect of whom a compliance check/investigation is being conducted, refuses to provide written explanations, an act is drawn up in any form, which indicates: the place, date and time of drawing up the act, position, last name, first name and patronymic (if any) of the employee of the Compliance Service who drew up the act, and the employees who were present at the refusal to give written explanations.

The act is signed by the employee of the Compliance Service who drew it up and other employees who were present at the refusal of written explanations.

3) request the necessary information on the issues of verification/investigation in the relevant structural divisions of the Company and EDSs;

- 4) receive advice from specialists on issues requiring special knowledge;

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5) in accordance with the established procedure, get acquainted with the documents (including confidential ones) related to the inspection/investigation, if necessary, attach their copies or extracts from them to the materials of the inspection/investigation;

6) make a proposal to bring to justice the employees of the Company who have committed a disciplinary offense and / or to recover material damage caused to the Company;

7) to engage internal and external specialists to perform their functions of conducting inspections/investigations in the manner prescribed by internal documents;

8) freely express and disclose the results of the audit/investigation to authorized officials of the Company;

9) material resources, which must be sufficient and appropriate for the effective conduct of the audit/investigation;

10) presenting recommendations to the management of the Company, independently or jointly with other divisions and officials, on the elimination of identified violations and shortcomings in the work of individual employees and divisions of the Company, as well as recommendations on optimizing the work of these divisions that became known in the course of the audit/investigation;

11) take other actions related to the implementation of their functions.

6.9.9. When conducting a compliance check/investigation, measures are taken to objectively and comprehensively establish:

1) the fact of committing an unlawful action / inaction and / or a disciplinary offense by an employee;

2) the reasons and conditions that contributed to the commission of an unlawful action / inaction and / or a disciplinary offense by an employee;

3) the nature and extent of the damage caused to the Company and/or SA as a result of an unlawful action/inaction and/or by an employee as a result of a disciplinary offence.

6.9.10. While conducting a compliance audit/investigation, auditors should be guided by the principles of independence, objectivity, professional competence, impartiality and confidentiality.

6.9.11. Persons carrying out compliance checks/investigations, for failure to fulfill their obligations when conducting compliance checks/investigations, bear responsibility established by the legislation of the Republic of Kazakhstan and internal documents of the Company.


6.9.15. Officials and employees of the Company and EDSs should not interfere with the activities of persons carrying out compliance verification/investigation and other compliance procedures.

6.9.16. Upon completion of the compliance check/investigation, the employee of the Compliance Service responsible for the event prepares a conclusion.

The conclusion indicates the essence of the established disciplinary and other unlawful action/inaction, their consequences, what materials confirm or exclude the fault of the Company employee, circumstances aggravating or mitigating his responsibility, reasons and conditions that contribute to the disciplinary offense of the Company employee and/or SA, and other unlawful action/omission, taken or proposed measures to eliminate them.

If it is established that the employee, in respect of whom the check/investigation was carried out, committed a disciplinary offense, depending on the severity of the offense committed and the degree of guilt, the conclusion reflects proposals for the application of a specific type of disciplinary sanction.

Bringing to disciplinary responsibility is carried out in compliance with the legislation of the Republic of Kazakhstan.

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The conclusion is signed by an employee of the Compliance Service who conducted the compliance check/investigation, employees of other structural units involved in the check/investigation and the Head of the Compliance Service.

6.9.17. If signs of a criminal or administrative offense are detected during the compliance check/investigation, the materials of the compliance check/investigation are transferred to the relevant law enforcement agencies for a decision.

The decision to transfer the opinion on compliance verification/investigation and related materials is made by the management of the Company.

6.10. Responsibility

6.10.1. Officials and employees bear criminal, administrative, civil and disciplinary liability for committing acts of corruption, corruption offenses in accordance with the legislation of the Republic of Kazakhstan.

6.10.2. Persons to whom appropriate measures of responsibility were applied for committing corruption offenses are not released from compensation for material damage to the Company, except by a court decision that has entered into force.

6.10.3. Officials and heads of structural divisions of the Company within their powers, as well as heads of third parties - counterparties working on behalf of the Company within the framework of contractual relations, or on behalf of a higher authority (auditors, agents, consultants, etc.), are responsible for organizing and coordinating activities to implement the provisions established by this Policy.

6.10.4. Officials (candidates) are required to confirm in writing the acceptance of anti-corruption restrictions in accordance with Appendix No. 3 to this Policy.


6.10.5. Officials are liable in accordance with the law for non-fulfillment or improper fulfillment of the requirements provided for by the anti-corruption legislation of the Republic of Kazakhstan, including for non-compliance with anti-corruption restrictions.

6.10.6. Officials and employees of the Company in the performance of their duties are obliged to:

- 1) get acquainted with the Policy, sign the obligation to comply with the Policy in accordance with Appendix No. 1 to the Policy and transfer it to the DHRMC;
- 2) be guided by the internal documents of the Company on combating corruption, records and memos of the Compliance Service on compliance with anti-corruption legislation;
- 3) take into account compliance with the Policy when assessing the business qualities of an employee, including in the case of his appointment to a higher position, resolving other personnel issues;
- 4) strictly comply with the restrictions and requirements provided for by the Policy, including those relating to giving, receiving gifts; implementation of entertainment expenses, charitable and sponsorship activities; participation in political activities; interaction with representatives of the state, persons subject to the Law of the Republic of Kazakhstan "On Combating Corruption", public organizations, counterparties, intermediaries, third parties; avoidance of conflicts of interest; report keeping.

6.10.7. Officials and employees of the Company are obliged to strictly observe the categorical prohibition on the following actions:

- 1) participate in corrupt practices, including not offering, promising, giving bribes;
- 2) ask for and receive bribes (commercial bribery);
- 3) participate in commercial bribery of contractors or contractors of employees/officials;

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4) make payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of cash or their equivalents, valuables, services or other benefits of a property and non-property nature, to any persons and from any persons or organizations, including commercial and non-profit organizations, authorities and local governments, persons subject to the Law of the Republic of Kazakhstan "On Combating Corruption", in order to obtain benefits for themselves, for the Company or for third parties.

6.10.8. Officials in the performance of their official duties must strictly observe the categorical prohibition on requests and receipt of bribes from the Company's counterparties and other third parties; observe anti-corruption requirements and restrictions established by other internal documents of the Company (to the extent not contrary to the Policy).

6.10.9. Employees of the Company, when interacting with Counterparties, must establish and maintain business relations with those Counterparties who conduct business relations on a conscientious and honest basis, care about their own reputation, demonstrate support for high ethical standards in their business activities, and implement their own anti-corruption measures.

6.10.10. The DHRMC is responsible for compliance with the norms of the Labor Code of the Republic of Kazakhstan in terms of anti-corruption restrictions, for fixing in writing by officials the adoption of anti-corruption restrictions and for publishing information provided for by anti-corruption legislation.

6.10.11. The Compliance Service is responsible for assessing corruption risks and conducting anti-corruption monitoring, as well as, within its competence, monitoring compliance by officials and employees of the Company with all other requirements of anti-corruption legislation.

6.10.12. The initiators of the contracts are responsible for the inclusion in the contracts concluded with the Counterparties of the Supplier's Code in accordance with Appendix No. 5 and an anti-corruption clause in the form provided for in Appendix No. 4 to this Policy, unless another form of clause is provided in the procurement contract templates in accordance with the Procurement Management Standard of the SWF JSC Samruk-Kazyna and organizations fifty or more percent of voting shares (participatory interests) of which are directly or indirectly owned by JSC "Samruk-Kazyna" on the right of ownership or trust management.

6.11. Final provisions

6.11.1. In order to comply with international standards of business ethics, openness and transparency of doing business, employees / officials of the Company are required to notify the Compliance Service of the Company of all cases of their inclination to commit corruption offenses, in accordance with the internal documents of the Company.

6.11.2. In case of doubts regarding the legality of the actions of other employees/officials of the Company, as well as counterparties, possible corruption and other corruption offenses, including but not limited to theft, fraud, bribery, commercial bribery, conflict of interest, etc., an employee/official, counterparty, shareholder or other person may report (including anonymously) about his doubts to the Compliance Service of the Company.

7. Recordings


7.1. There are no records in this Policy that must be managed in accordance with the requirements of the documented procedure DR-03-20 "Records Management".

8. Revision, modification, storage and distribution

8.1. Revision, modification, storage and distribution of this Policy is carried out in accordance with the requirements of the documented procedure "Document Regulation" (DR-02).

8.2. The "original" paper form of this Policy is drawn up and stored in the Compliance Service of the Company.

8.3. A scanned version of this Policy is posted on the Company's Internet portal.

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Applications

Annex 1

*Use this form to confirm that you have carefully studied, understood and undertake to follow in good faith the requirements established by the Anti-Corruption Policy of JSC "NC "QazaqGaz"
The completed and signed commitment form is filed by the DHRMC in the employee's personal file.*

COMMITMENT compliance with the norms of the Anti-Corruption Policy of JSC "NC "QazaqGaz"

Please check the appropriate boxes

- I confirm that I have studied and understood the Anti-Corruption Policy of JSC NC QazaqGaz (hereinafter - Policy).**
- I will strictly follow the requirements set out in the Policy, including:**
 - ✓ not participate in corrupt practices directly or indirectly, personally or through the Intermediary of third parties, including not offering, giving, promising, asking or receiving bribes and facilitation payments in any form (facilitating payments), including in the form of money, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, government and self-government bodies, Kazakhstani and foreign government officials, private companies and their representatives.
 - ✓ abstain from behavior that can be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests or on behalf of JSC NC QazaqGaz.
 - ✓ immediately inform the immediate supervisor and the person responsible for monitoring compliance with the Policy:
 - on cases of inducing an employee to commit corruption offenses;
 - about information that has become known to the employee about cases of corruption offenses committed by other employees, contractors of JSC NC QazaqGaz, or other persons;
 - about the possibility of a conflict of interest arising or arising from the employee.
- I am aware that, in the event of my breach anti-corruption requirements of Kazakhstan and other applicable legislation, as well as the Policy, I can be brought to civil, administrative and criminal liability, including dismissal from my position, in the manner prescribed by the legislative acts of the Republic of Kazakhstan.**
- I am aware of the possibility to inform the hotline of JSC NC QazaqGaz, the Compliance Service of JSC NC QazaqGaz about the existing suspicions of the legality or ethics of my actions, as well as actions, inaction or proposals of other employees, contractors or other persons who interact with JSC NC QazaqGaz.**
- It has been clarified to me that no Employee of JSC NC QazaqGaz, including me, will be subject to sanctions and prosecution by JSC NC QazaqGaz if he reported an alleged fact of corruption, or if he refused to give or receive a bribe, commit commercial bribery or mediate bribery in any other way, including as a result of such a refusal, JSC NC QazaqGaz experienced lost profits or did not receive commercial and competitive advantages.**



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It was explained to me that if I have additional questions about the principles and requirements of the Policy and applicable anti-corruption legislation, I can contact the Compliance Service of JSC NC QazaqGaz.

*Please sign here
(EDS signature)*


_____ «____» _____ 20__ Full name, Signature / EDS
signature

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Annex 2

Gift and Hospitality acts Record Form

No. p/n	Date of the act of hospitality, receipt of a gift	Name and position of the person who submitted the notice of receipt of the gift	Name of the gift, description of the act of hospitality	Name and position of the person receiving the gift	Name, full name of the giver	Special marks
1	2	3	4	5	6	7

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Annex 3

Form of Consent to Accept Anti-Corruption Restrictions and confirmation of the accuracy of information

I, _____,

(Full Name)


(indicate the position of the person who is an official and / or a person exercising managerial functions)

(indicate if consent is provided by a person who is a candidate for a position related to the above functions)

(specify company)

in order to comply with the requirements of the Law of the Republic of Kazakhstan "On Combating Corruption" dated November 18, 2015 No. 410-V (hereinafter - Law), other by-laws and internal regulatory documents of the group of companies JSC "NC "QazaqGaz", avoid committing actions that may lead to my using my powers for personal, group and other non-official interests, I accept the anti-corruption restrictions provided for by the Law, taking into account the specifics established by Articles 13, 14, 14-1 and 15 of the Law, on:

- 1) carrying out activities that are incompatible with the performance of functions;
- 2) Inadvisability of joint job (work) of close relatives, spouses and in-laws, including in one structural unit and have close relatives, a spouse and (or) in-laws in direct subordination, or in different departments, if the position is functionally related (by business processes and procedures) to the positions held by their close relatives, spouses and in-laws;
- 3) using of official and other information not subject to official distribution in order to obtain or extract property and non-property benefits and advantages;
- 4) acceptance of material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions are included in the official powers of the persons specified in paragraph one of this paragraph, or these persons, by virtue of their official position, can contribute to such actions (inaction);
- 5) opening and holding accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, keeping cash and valuables in foreign banks located outside the Republic of Kazakhstan.

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I undertake to strictly follow the requirements established by the anti-corruption legislation of the Republic of Kazakhstan.

I am not a person deprived of the right to hold any position for a certain period of time by a court decision that has entered into legal force and/or brought to criminal/administrative/disciplinary liability and having a criminal record, as well as a person held accountable for committing a corruption offence.

I undertake to notify the management of the organization in writing about close relatives, spouse and (or) in-laws working in this organization before employment or within one working day from the date of occurrence of such a circumstance. I am aware that if I voluntarily within three months from the moment of detection of the specified violation, I do not eliminate such a violation, then I will be transferred to a position that excludes such subordination, and if such a transfer is impossible, then one of such employees is subject to dismissal from office or other release from these functions.

I am notified that if I violate the anti-corruption legislation of the Republic of Kazakhstan, I may be held accountable, including dismissed from my position, in the manner prescribed by the legislation of the Republic of Kazakhstan.

I am notified that the money received on my account or the accounts of my family members without our knowledge, as well as the funds received by me or them in violation of subparagraph 4) of paragraph 1 and paragraph 5 of Article 12 of the Law, no more than two weeks after their discovery, are subject to transfer to the republican budget with an explanation to the appropriate state revenue body on the circumstances of receipt of such funds.

I am notified that gifts received without the knowledge of my or my family members, as well as those received by me and them in violation of subparagraph 4) of paragraph 1 and paragraph 5 of Article 12 of the Law, are subject to gratuitous transfer to the authorized state property management body within seven calendar days from the date of receipt of the gift or from the day when I or we became aware of the receipt of the gift, and the services rendered to these persons under the same circumstances must be paid for by transferring money to the republican budget within seven calendar days, from the day from the date of provision of the service or from the day when the person specified in paragraph one of paragraph 1 of Article 12 of the Law became aware of the provision of the service. In this case, the person who transferred the gift to the authorized body for state property management, law of the Republic of Kazakhstan "On valuation activities in the Republic of Kazakhstan", on the basis of a sale and purchase agreement concluded with the authorized body for state property management. The proceeds from the sale of gifts are transferred to the republican budget.

I will not have any claims against the company regarding the collection, storage, processing and cross-border transfer of my personal data in the future, provided that the company complies with the requirements of current legislation.

I am aware that non-acceptance of anti-corruption restrictions entails refusal to hire or dismissal from post (discharge from office), their non-compliance in cases where there are no signs of a criminally punishable act and an administrative offense is the basis for termination of labor relations.



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(Job title)

Full name (write in full)

Date

Signature/ EDS signature

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Annex 4

Anti-Corruption Clause Form

1. JSC NC QazaqGaz (hereinafter - the Company) informs the other party to the Agreement (hereinafter - the Counterparty) about the principles and requirements of the Company's Anti-Corruption Policy (hereinafter - the Policy). By signing the Agreement, the Counterparty confirms familiarization with the Policy posted on the official website of the Company.

2. The Counterparty undertakes to comply with and ensure compliance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan, as well as not to commit corruption offenses provided for by international acts applicable for the purposes of the contract and legislative acts of foreign states on combating corruption and comply with the guarantees of this clause.

3. The Counterparty confirms that it is not a state-related person and does not have persons subject to the Law of the Republic of Kazakhstan "On Combating Corruption", which are its officials, employees, or direct or indirect owners. The counterparty undertakes to immediately inform the Company in writing of all cases when any person subject to the Law of the Republic of Kazakhstan "On Combating Corruption" becomes an official or employee of the counterparty or acquires a direct or indirect interest in the counterparty's organization.

4. In the performance of their obligations under the Agreement, the Parties and their employees do not pay, do not offer to pay, and do not allow the payment of any money or valuables, directly or indirectly, to any person to influence the actions or decisions of these persons in order to obtain any improper advantages or other illegal purposes.

5. When fulfilling their obligations under the Agreement, the Parties and their employees do not carry out actions qualified by applicable law for the purposes of the Agreement as giving/receiving a bribe, commercial bribery, as well as actions that violate the requirements of applicable law and international acts on combating the legalization (laundering) of proceeds from crime.

6. Each of the Parties to the Agreement refuses to stimulate employees of the other Party in any way, including by providing sums of money, gifts, free performance of works (services) in their address and in other ways that put the employee in a certain dependence, and aimed at ensuring that this employee performs any actions in favor of the Party stimulating him.


7. If a Party suspects that a violation of any anti-corruption conditions has occurred or may occur, the relevant Party undertakes to notify the other Party in writing.

8. In a written notice, the Party is obliged to refer to the facts or provide materials that reliably confirm or give reason to believe that a violation of any provisions of these conditions by the counterparty, its employees has occurred or may occur, expressed in actions qualified by applicable law as giving or receiving a bribe, commercial bribery, as well as actions that violate the requirements of applicable law and international acts on combating the legalization of proceeds from crime.

9. The Counterparty undertakes to conscientiously provide assistance and assistance to the Company in the event of an actual or potential violation of the requirements of this Anti-Corruption Clause.

10. To report cases of violation of the requirements, the Counterparty is obliged to use the "Hot Line", information about which is posted on the official website of the Company.

Note: it is allowed to make changes and/or additions to the form of the Anti-Corruption Clause as agreed by the parties of the Agreement.

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Annex 5

Supplier Code of JSC NC QazaqGaz

1. Purpose.

1.1. The Code of the Supplier of JSC NC QazaqGaz (hereinafter - Company) contains the minimum standards that the Company asks to comply with and respect in the framework of joint commercial activities with the Company.

1.2. Sustainable business development is a key basis of the Company's strategy, which is aimed at responding resolutely to the social needs and expectations of the Company's stakeholders.

2. Basic provisions

2.1. The standards set forth in the Code reflect the expectations of the Company from the Supplier with which the Company works, including from its subsidiaries and affiliates, as well as other parties with which the Supplier does business, including from all its employees (including permanent and temporary employees).

2.2. The Supplier of the Company must comply with the requirements of the legislation of the Republic of Kazakhstan, other applicable legislation, internal documents of the Company, and in particular the principles set forth in this document.

2.3. All business information and reporting activities must be performed honestly and faithfully, and comply with all applicable laws governing their performance and accuracy.

2.4. The Supplier will not issue press releases or other publications about its relationship or agreements with the Company without the prior written consent of the authorized representative of the Company under the relevant agreement.

2.5. The Supplier is responsible for disseminating, familiarizing and carefully verifying compliance with the provisions of this Code by its employees.

3. General principles

The Supplier of the Company complies with the following:

- does not allow corruption offenses in his work;
- prohibits its employees, representatives and co-executors under contracts with the Company to commit commercial bribery and other actions of a corrupt nature;
- excludes all forms of illegal forced labor;
- eliminates child labor;
- excludes any kind of discrimination, including in relation to employment and labor activity;
- complies with the normative legal acts concerning the minimum wage;
- complies with the labor legislation of the Republic of Kazakhstan and/or other country where its activities are carried out.

4. Anti-corruption requirements

4.1. All forms of corruption, including solicity, bribery, facilitation fees, fraud, money laundering and nepotism in the activities of the Supplier are strictly prohibited.

4.2. If the Company has objective suspicions and evidence of violations by the Supplier of the requirements of this Appendix, such violation is considered a material breach of the Agreement, and

the Company has the right to suspend payments or terminate this Agreement without prejudice to the Company's rights under this Agreement or the legislation of the Republic of Kazakhstan. In addition, in the event that any such breach results in a criminal offense for the Company, this Agreement will be immediately suspended and/or terminated upon notice to the Supplier, notwithstanding any right to remedy such breach which may be provided elsewhere in this Agreement.

4.3. To implement the above requirements, the Supplier must ensure that any individual or legal entity engaged by the Supplier to provide services under this Agreement acts solely on the basis of a written agreement that provides for him responsibilities and obligations similar to those assigned to the Supplier in accordance with this Appendix; at the same time, the Supplier continues to be responsible for the observance and fulfillment by such persons of these conditions, as well as to be directly liable to the Company in case of their violation.

4.4. The Supplier shall indemnify the Company and its direct and indirect shareholders, directors (this requirement does not apply to shareholders of a company listed on the stock exchange), officers and employees of all losses, including any civil or criminal sanctions, or fines, incurred by them as a result of the violation by the Supplier of the provisions of this Supplier Code.

4.5. The Supplier and any individuals or legal entities engaged by the Supplier to fulfill obligations under the Agreement, including their employees, agents, consultants, contractors and subcontractors:

- must not offer, promise, give, solicit or receive bribes or other corrupt payments, including to any official person;

- must not, intentionally or through negligence, commit actions that may lead to a violation by the Supplier or the Company, or any of their direct or indirect shareholders, directors, officers or employees, of the legislation of the Republic of Kazakhstan on combating corruption;

- must report that the official or his close relative has a direct or indirect property interest / control in the Supplier's company (this requirement does not apply to shareholders of a company listed on the stock exchange);

- must inform the Company about whether the Supplier is now or becomes in the future the employer of any person holding a responsible public position, persons equivalent to them, and immediately notify the Company of any changes in such relations;


- must accept payments from the Company, if only they are made in a non-cash form or by means of another traceable means of payment to the Supplier's bank account in the country of the Supplier's registration or in the country of delivery of the procurement results;

- must immediately notify the Company of any allegations of fraud, bribery, corruption or other illegal activities brought against the Supplier in the course of judicial, arbitration or administrative proceedings, or in the event of an investigation into such allegations at any time during the term of this Agreement;

- if the Company has reasonable suspicions of violation (or possible violation) of the legislation of the Republic of Kazakhstan, they must interact in good faith with the Company and its representatives to establish the fact of such a violation;

- agree that the audit can be carried out only by the Company's employees or a third-party professional organization engaged by the Company on the basis of a relevant agreement. All costs associated with the audit shall be carried by the Company, unless the audit reveals a material breach by the Supplier of the terms of this Agreement. In this case, all costs associated with its implementation shall be carried by the Supplier.

4.6. The Supplier imposes a total prohibition on its employees from offering, requesting, giving or accepting, directly or indirectly, payments, gifts or benefits in exchange for favorable

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treatment in order to influence a transaction or for personal or business advantages. This requirement applies to both employees and family members of the Supplier's employees and their co-executors.

4.7. The supplier must comply with the principles of fair competition and the free market. Business decisions should not be made based on or influenced by personal relationships and interests.

4.8. The Supplier shall implement an anti-corruption program based on the laws of the Republic of Kazakhstan and international standards. The program, which includes relevant practical and informational training, should be transparent and effective.

4.9. The Supplier of the Company makes every effort to identify and prevent situations in which there is a real or potential conflict of interest regarding the employees of the Supplier and the employees of the Company or their relatives, which may adversely affect their business reputation or decisions made.

4.10. The Supplier undertakes to provide the Company with the disclosure and verification of information on all subcontractors and affiliates, as well as information on the registration of the ultimate beneficiary in offshore zones.

4.11. The Supplier is prohibited from paying for travel, lodging, gifts, hospitality, entertainment and charitable contributions on behalf of the Company.

5. Conflict of interest.

5.1. The Supplier must inform the Company about any situation that may constitute a conflict of interest and that may affect the business relationship, and prevent it.

5.2. When carrying out activities, the Supplier should make decisions based only on objective criteria. Any factors that may affect acceptance of solution providers due to conflicts of personal, commercial or other interests should be excluded from the outset.

5.3. If an employee of the Supplier is a relative or relative of an employee of the Company, and this may be the basis for a conflict of interest in the performance of the Agreement or the conduct of business relations, the Supplier must inform it to the management of the Company.

6. Human rights and labor standards


6.1. The Supplier shall provide all employees with appropriate working conditions and ensure that all labor rights of employees are enforced.

6.2. Any discrimination is prohibited regardless of the grounds, including in relation to employment and labor activity, sex or gender identity, nationality, citizenship, race, skin color or ethnicity, religion, age, language, marital status, social and parental status, property and official status, membership in public associations and political motives, pregnancy, disability, as well as other circumstances not related to the business qualities of the employee and the results of his work.

6.3. The Supplier shall not require workers or potential workers to undergo medical tests, including pregnancy tests, except as required by applicable law or regulation, or as necessary to maintain workplace safety. The provider must not discriminate based on test results.

6.4. The Supplier shall create an accessible environment for people with disabilities in accordance with the requirements of the law.

6.5. The provider is prohibited from using forced labor, prison labor, human trafficking, and the purchase of commercial sexual services. All forms of forced labour, including bonded labour, involuntary labor (including slavery) or other forms of forced labour, are prohibited. Support or participation in any form of human trafficking or forced labor through threats, use of force, fraudulent statements or other forms of pressure is prohibited.

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6.6. It is prohibited to employ persons who have not reached the minimum age for employment established by applicable law. The Supplier shall not use the labor of children or minors, unless an employment contract is permitted under applicable law.

6.7. All Supplier's employees must have a signed employment contract. The employment contract must set out all major terms, including hours of work, overtime compensation, notice period, wages and frequency of payments, and other terms and conditions as required by applicable law.

6.8. The supplier complies with the regulations regarding working hours and rest of employees and other obligations of the employer.

6.9. The Supplier complies with the regulatory legal acts of the Republic of Kazakhstan regarding the minimum wage established by the legislation of the Republic of Kazakhstan. Overtime work, work on weekends and holidays or at night is paid at an increased rate in accordance with the conditions, labor or collective agreements and (or) the act of the employer.

6.10. The Supplier shall ensure that employees know and fully understand the rights and obligations of employees, as set out in their native or understandable language.

6.11. Job descriptions should be developed, updated and communicated to all employees and consultants.

6.12. No one should be subjected to physical punishment, illegal detention, physical, sexual and/or psychological harassment.

6.13. The Supplier shall respect the freedom of association for its employees in accordance with applicable law.

7. Health and labor safety.

7.1. The Supplier guarantees that its activities are safe for the health of its employees, contractors, and other persons, as well as the safety of the employees of the Company, on the territory and premises of which the contractual relations are carried out.

7.2. The Supplier of the Company shall provide working conditions of work, employees shall be familiar with the information on health and safety at work, and receive appropriate training, including fire safety, radiation safety, proper handling of chemicals and equipment, and emergency preparedness and first aid.

7.3. Potential risks that could lead to accidents/injuries or occupational diseases for the Supplier's employees must be assessed and controlled by taking appropriate preventive actions (for example, design, engineering, administrative controls, preventive maintenance, work safety procedures, ongoing safety training, and the provision of personal protective equipment).

7.4. The Supplier is obliged to take adequate measures to prevent or eliminate the consequences, damage from accidents and injuries, as well as psychosocial diseases in order to minimize the factors inherent in hazardous types of work. The Supplier shall provide its employees with appropriate personal protective equipment at no additional charge. Any incident or accident resulting in physical injury, as well as psychosocial illness, must be documented and brought to the attention of the Supplier's senior management.

7.5. The Company is actively working to continuously improve safety in the Company, ensure the safety of its employees and obliges its business partners to do so. When performing work at production sites, the Supplier complies with high standards of labor protection and safety, and is responsible for prompt notification of an emergency.

8. Environmental protection.

8.1. The society recognizes its social responsibility for environmental protection and stands for environmental sustainability. The Society expects the Supplier to share the corporate commitment to proactively reduce carbon emissions, reduce water consumption and minimize waste generation.

8.2. The Supplier shall implement and/or implement measures that contribute to the preservation of the environment and reduce, to the maximum extent possible, their negative impact on natural resources.

8.3. The supplier limits the amount of harmful substances generated during the performance of the contract, and also ensures the elimination of such waste without causing great harm to the environment.

8.4. The supplier must take measures to prevent the use of toxic substances. In the absence of an alternative, the Supplier shall minimize the use of toxic substances and ensure their safe handling and disposal. With regard to other hazardous substances, elements or restricted waste, the Supplier must strictly comply with all applicable legal regulations.

8.5. The supplier develops both environmentally friendly technologies (for example, pollutant control, carbon dioxide emissions) and energy saving and waste recycling technologies, as well as implements logistics strategies that reduce their negative environmental impact (especially with regard to storage, handling and transportation).

9. Privacy and data security

9.1. The Supplier must protect confidential information, keep confidential any information about the Company, its partners, business events, contracts, projects, structure, financial situation or activities, unless they have received special written permission to disclosure.

9.2. The Supplier must use systems that guarantee the safety and security of customer data and prevent leakage of confidential data.

9.3. The Supplier ensures the implementation of emergency and disaster recovery measures that ensure data protection, as well as business continuity in relation to goods, works and / or services provided to the Company. The arrangements should include implementation procedures and, at a minimum, plans for continuity and recovery in the event of adverse weather or other natural disasters, shortages of manpower or other resources, downtime or unavailability of the system and/or facilities, power outages and communication outages.


9.4. The Provider shall notify the Company of any data security vulnerabilities and immediately correct them.

10. Corporate ethics

10.1. Supplier undertakes to act in accordance with national and international competition laws and not engage in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

10.2. The Provider undertakes not to facilitate, directly or indirectly, money laundering or terrorist financing.

10.3. The Supplier must comply with national and international export control measures, as well as trade, economic and financial sanctions and embargoes applicable to its activities. The Supplier must become familiar with and comply with the trade restrictions that apply to its business, including the countries and organizations that are subject to sanctions.

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10.4. The supplier shall operate in accordance with the principles of responsibility and honesty. The Supplier shall use internal control systems to detect and prevent fraud and money laundering and response measures in such cases. All cases of potential fraud that could affect the activities of the Company should be reported immediately.

11. Final provisions.

11.1 The requirements of this Supplier Code form an integral part of the contract.

11.2 The Supplier of the Company hereby undertakes to familiarize its employees with this Supplier Code.

11.3. The Supplier and/or its employees are obliged to inform the Company about any identified or suspected violation of the Supplier's Code. This will not be used against the Supplier and/or its employees if they are acting in good faith. If anyone receives information, or assumes, or becomes a witness to the commission of any actions that violate the Supplier's Code, the relevant information must be transferred to the Company through the communication channels indicated on the website <https://qazaqgaz.kz>.

I (Full name) _____, acting on the basis of _____, hereby confirm that, being an authorized representative of the Supplier, I have carefully checked and understood the contents of this document, and also confirm that the Supplier is acting in full compliance with this Supplier Code.

Full name _____

Company name _____

Date: _____

Signature: _____

Seal.

Reference list

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