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Annex No.5
to the decision of the Board of Directors
JSC “NC “QazaqGaz”
No. 10/25 dated 5 June 2025

Approved
by decision of the Board of Directors
JSC “NC “QazaqGaz”
Minutes of Meeting No. 10/25
dated 5 June 2025

COMPLIANCE SERVICE REGULATION
JOINT STOCK COMPANY “NATIONAL COMPANY “QAZAQGAZ”

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1. General provisions

1.1. This Regulation on the Compliance Service of Joint Stock Company “National Company “QazaqGaz” (hereinafter referred to as the Regulation) has been developed in accordance with the anti-corruption legislation of the Republic of Kazakhstan, methodological recommendations on the organization of the anti-corruption compliance institute in quasi-public sector entities, approved by the authorized anti-corruption authority, and Samruk-Kazyna Group Corporate Standard on the Compliance Function, ST RK 37001, as well as other internal documents of the Joint Stock Company “National Company “QazaqGaz” (hereinafter - the Company).

1.2. This Regulation defines the status of the Company Compliance Service, the goals, objectives, principles, functions, rights and powers of the Compliance Service, the competence, organization and procedure of the Compliance Service activities, and the interaction of the Compliance Service with the Company's Board of Directors, the structure and staffing of the Compliance Service, and the main qualification requirements for Compliance Service employees.

1.3. The concepts contained in the Regulation are applied in the following meaning:

1) **anti-corruption compliance** - function of ensuring that the Company and its employees comply with the anti-corruption legislation of the Republic of Kazakhstan;

2) **internal analysis of corruption risks** - identifying and studying the causes and conditions that contribute to the commission of corruption offenses;

3) **subsidiaries and affiliates** - subsidiaries and dependent companies, including organizations under trust management agreements, jointly controlled organizations and joint ventures of the Company;

4) **compliance risk** - the risk of incurring expenses (losses) as a result of the Company's non-compliance with the requirements of the legislation of the Republic of Kazakhstan, including standards, internal regulatory documents of the Company;

5) **conflict of interests** - a contradiction between the personal interests of officials / 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;

6) **corruption offense** - an illegal culpable act (action or omission) that has signs of corruption, for which administrative or criminal liability is established by law;

7) **corruption risk** - possibility of occurrence of causes and conditions that contribute to the commission of corruption offenses;

8) **prevention of corruption** - activity of the Company to study, identify, limit and eliminate the causes and conditions that contribute to the commission of corruption offenses, by developing and implementing a system of preventive measures;

9) **authorized anti-corruption body** - a state body responsible for the formation and implementation of the anti-corruption policy of the Republic of Kazakhstan and coordination in the field of anti-corruption, as well as prevention, detection, suppression, disclosure and investigation of corruption offenses, and its territorial divisions.

1.4. The Compliance Service is a structural division of the Company that ensures compliance with the anti-corruption legislation of the Republic of Kazakhstan, determines the anti-corruption policy, monitors the implementation of anti-corruption measures, as well as the formation of an internal corporate culture based on transparency and honesty, and conducts business in accordance with the legislation of the Republic of Kazakhstan, best international practices and internal regulatory documents of the Company.

1.5. The mission of the Compliance Service is to provide the necessary assistance to the Board of Directors and the Management Board of the Company in building an effective compliance system, providing reasonable assurance that significant compliance and corruption risks are being properly managed.

1.6. The Compliance Service exercises its powers independently of the Company's executive body and officials, is accountable to the Company's Board of Directors, and is independent in ensuring compliance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan.

1.7. The Board of Directors of the Company, based on decisions on preliminary approval / consideration by the Audit Committee of the Board of Directors of the Company (hereinafter referred to as the Audit Committee):

1) defines how the Compliance Service works.

2) Approves the structure and staffing of the Compliance Service.

3) decides on the appointment, determination of the term of office of the head and employees of the Compliance Service, early termination of the powers of the head of the Compliance Service, as well as determining the amount and conditions of remuneration and bonuses, the application of a disciplinary

penalty, and the assessment of the activities of the head and employees of the Compliance Service;

4) reviews periodic reports on the activities of the Compliance Service and approves the work plans of the Compliance Service;

5) approves the documents of the Compliance Service in accordance with the list of documents regulating the internal activities of the Company, approved by the Board of Directors of the Company, approved by the decision of the Board of Directors of the Company.

1.8. The full-time strength of the Service is 3 (three) units, including the head.

1.9. Social support, guarantees, compensation charges and bonuses for the Compliance Service are provided in accordance with the Company's internal regulatory documents.

1.10. For violation of labor discipline, failure to perform or improper performance of assigned labor duties, employees of the Compliance Service are subject to disciplinary measures in accordance with the procedure established by labor legislation and internal regulatory documents of the Company.

1.11. The Company Management Board:

1) contributes to the creation of an effective environment for the implementation of the activities of the Compliance Service and assists in the implementation of its goals, tasks, functions and responsibilities, in the implementation of rights;

2) provides administrative (organizational and technical) support for the activities of the Compliance Service;

3) provides the Head and employees of the Compliance Service with the opportunity to receive training, advanced training and certification on compliance activities, social and communication skills and competencies.

1.12. Employees of the Company's structural divisions provide assistance to the Compliance Service by:

1) providing documents and information necessary for the implementation of the tasks and functions of the Compliance Service;

2) objective discussion of identified risks and violations;

3) joint solution of emerging issues and problems.

1.13. It is not allowed to combine the functions of the Compliance Service with the functions of other structural divisions of the Company.

1.14. The main qualification requirements for the head and employees of the Compliance Service are defined in the Samruk-Kazyna Group Corporate Standard on Compliance Functions.

1.15. If legislation and international standards in the field of anti-corruption establish other requirements and approaches to the organization of anti-corruption compliance that are not provided for in this Regulation, the requirements and approaches of legislation and international standards apply. An employment contract with the head and employees of the Compliance Service is concluded by the Chairman of the Management Board, who exercises other rights and obligations of the employer in accordance with the labor legislation of the Republic of Kazakhstan.

1.16. The performance of the Compliance Service is evaluated by the Company Board of Directors in accordance with the Goals Map of the Head and Employees of the Compliance Service approved by the Company Board of Directors.

1.17. In its activities, the Compliance Service is guided by the legislative and other legal acts of the Republic of Kazakhstan, including the Law of the Republic of Kazakhstan "On Gas and Gas Supply", the Law of the Republic of Kazakhstan "On Corruption Control", the Company Charter, the Company Anti-Corruption Policy, the Company Code of Business Ethics, decisions of the Company authorities, this Regulation and other internal documents, regulatory documents of the Company.

1.18. Employees of the Compliance Service are subject to the provisions of the Company's internal regulatory documents, except for those provisions that cannot be applied in connection with the status of the Compliance Service in accordance with the legislation of the Republic of Kazakhstan and this Regulation.

1.19. In carrying out the tasks and functions assigned to it, the Compliance Service should be independent of the influence of any persons, in order to properly perform them and ensure objective and independent judgments.

2. Compliance Service goals and principles, tasks and functions

2.1. The main objectives of the compliance service are:

1) ensuring that the Company and its employees comply with the anti-corruption legislation of the Republic of Kazakhstan;

2) monitoring the implementation of anti-corruption measures in the Company and the group of Companies;

3) develop recommendations for establishing and maintaining processes for ensuring compliance with the requirements of anti-corruption legislation by the Company and organizations belonging to the Company group.

2.2. When implementing the compliance function, the Company is guided by the following principles:

- 1) Whether the Compliance Service has sufficient authority and resources to perform its tasks.
- 2) management's interest in the effectiveness of compliance ("tone from the top");
- 3) information transparency of the Compliance Service activities;
- 4) independence of the Compliance Service;
- 5) continuity of compliance implementation;
- 6) improving compliance;
- 7) continuous compliance with the competencies of employees performing compliance functions.

2.3. The main tasks of the Compliance Service are:

1) ensuring the introduction of tools to prevent the commission of corruption offenses by the Company and its employees, including ensuring internal analysis of corruption risks, anti-corruption monitoring, and the formation of an anti-corruption culture;

2) implementation of a system of anti-corruption measures and compliance with corporate ethics in the Company;

3) ensuring compliance with external and regulatory requirements and international best practices on anti-corruption issues;

4) ensuring compliance with the basic principles of anti-corruption in accordance with the Law of the Republic of Kazakhstan "On Anti-Corruption";

5) resolution of conflicts of interest.

1) Functions of the Compliance Service: collecting, processing, summarizing, analyzing and evaluating information on the effectiveness of the Company anti-corruption policy;

2) coordination of internal analysis of corruption risks in the Company activities;

3) monitoring identified corruption risks in the Company and measures taken to mitigate and eliminate them;

4) conduct awareness-raising activities on anti-corruption issues and the formation of an anti-corruption culture in the Company and the companies of the Company's group;

5) ensuring control over the Company employees' compliance with internal regulatory documents related to anti-corruption, corporate ethics and behavior, use of insider information, conflict of interest resolution, initiative and formation;

6) analysis of the Company's key business processes ' exposure to corruption, regulatory, and reputational risks and preparation of recommendations for improving business processes in order to minimize these risks;

7) ensuring the development, implementation and updating of internal regulatory documents on compliance issues;

8) promoting the formation of a culture of relationships in the Company that meets generally accepted moral and ethical standards: communication, training of the Company's employees on compliance issues, and the use of insider information;

9) ensuring the creation, testing, and implementation of a procedure for verifying the reliability of counterparties;

10) at the request of the Company structural divisions, perform a comprehensive audit of the trustworthiness of third parties - potential and existing counterparties, followed by monitoring with an increased level of risk, and candidates for vacant positions at the CEO-1 and CEO-2 levels in the Company and organizations belonging to the Company's group, decisions on which are made by the Company's bodies;

11) conducting official inspections on corruption facts in the Company and organizations belonging to the Company group and/or participating in them;

12) evaluating the effectiveness of implementing anti-corruption measures by the Company structural divisions and employees;

13) making recommendations to the Chairman of the Management Board of the Company on eliminating identified corruption risks and improving the efficiency of internal processes of the Company and its subsidiaries' activities;

14) coordination of automation of compliance processes in the Company group together with interested structural divisions of the Company;

15) coordination of work on compliance with the requirements in the field of insider information security, including internal control over its disposal and use;

16) monitoring the implementation of internal regulatory documents on compliance;

17) performing other functions, including those provided for in the Samruk-Kazyna Group Corporate Standard on Compliance Functions;

18) interaction with the authorized anti-corruption body and state bodies, quasi-public sector entities, public associations, as well as other individuals and legal entities on anti-corruption issues;

19) participation in an external analysis of corruption risks in the Company's activities, carried out by a joint decision of the first heads of the authorized anti-corruption body and the Company;

20) monitoring and analysis of changes in anti-corruption legislation, judicial practice in cases related to corruption;

21) ensuring compliance with financial control measures and anti-corruption restrictions established by the Law of the Republic of Kazakhstan "On Corruption Control" by persons equated to persons authorized to perform state functions within their competence;

22) monitoring the implementation by the Company structural divisions of the internal anti-corruption action plan;

23) taking measures within the scope of their competence to identify, including control procedures, monitor and resolve conflicts of interest, including in matters of employment, procurement and business processes;

24) providing practical and methodological assistance in organizing the activities of persons responsible for performing the functions of anti-corruption compliance in the Company subsidiaries and affiliates;

25) monitoring the implementation of compliance policies and standards in the Company subsidiaries and affiliates in order to ensure a uniform approach to the implementation of anti-corruption policies in the Company and its subsidiaries and affiliates;

26) review, within the framework of corporate governance procedures, materials on compliance issues submitted for consideration by the Board of Directors/Supervisory Board of subsidiaries and affiliates, including candidates for a position in the Compliance Service of subsidiaries and affiliates;

27) consideration and approval of materials on issues submitted for consideration by the Board of Directors and the Management Board of the Company, within the competence of the Compliance Service.

3. Compliance Service powers and responsibilities

3.1. The Head of the Compliance Service has the following powers:

1) attend, by invitation, meetings of the Management Board and the Board of Directors of the Company, meetings of collegial bodies attached to the Management Board and the Board of Directors of the Company and its subsidiaries and affiliates;

2) sends mandatory compliance instructions to persons performing the compliance function in subsidiaries and affiliates, and initiates the creation of collegial advisory bodies (working groups) at the Company on improving the methodology of the compliance function and the practical application of anti-corruption legislation in the Company's group;

3) represents the interests of the Company on anti-corruption compliance issues in relations with third parties on the basis of a power of attorney issued by the Chairman of the Management Board of the Company or a person acting as such.

3.2. Within the scope of its competence, the Compliance Service has the following powers:

1) The Head and employees of the Compliance Service sign documents and requests sent on behalf of the Compliance Service to the Company's structural divisions, subsidiaries and affiliates on issues falling within the competence of the Compliance Service, on the basis of a power of attorney issued by the Chairman of the Management Board of the Company or a person acting as such;

2) requests and receives information and materials from the Company's structural divisions on an unrestricted and unimpeded basis, including those constituting commercial and official secrets;

- 3) has access to all information of the Company, including insider information marked "for official use", to the Company's information and accounting systems;
- 4) has direct and prompt access to the Board of Directors on any issue related to corruption or the anti-bribery management system, without consulting any employees and management of the Company;
- 5) on the basis of power of attorney, represents the interests of the Company and / or acts as representatives of the Company in state and non-state bodies and organizations;
- 6) conducts internal checks on incoming reports of possible corruption offenses or violations of the anti-corruption legislation of the Republic of Kazakhstan;
- 7) involves employees of the Company's structural divisions, subsidiaries and affiliates, in coordination with the relevant head, to carry out certain assignments of the Board of Directors, the Audit Committee, and the Chairman of the Management Board of the Company;
- 8) holds meetings and creates working groups, including with the participation of representatives of subsidiaries and affiliates on anti-corruption compliance issues;
- 9) participates by invitation and without the right to vote in meetings of the Company's Management Board, meetings of collegial bodies attached to the Company's Management Board and subsidiaries and affiliates;
- 10) conducts interviews with candidates for vacant positions of compliance function managers / persons performing the compliance function in the singular in subsidiaries and affiliates and makes recommendations to the management bodies of subsidiaries and affiliates based on the results of the interview;
- 11) involves employees of the Company's structural divisions, subsidiaries and affiliates, in coordination with the relevant head, to carry out certain assignments of the Board of Directors, the Audit Committee, and the Chairman of the Management Board of the Company;
- 12) holds meetings and creates working groups, including with the participation of representatives of subsidiaries and affiliates on anti-corruption compliance issues;
- 13) participates by invitation and without the right to vote in meetings of the Company's Management Board, meetings of collegial bodies attached to the Company's Management Board and subsidiaries and affiliates;
- 14) conducts interviews with candidates for vacant positions of compliance function managers / persons performing the compliance function in the singular in subsidiaries and affiliates and makes recommendations to the management bodies of subsidiaries and affiliates based on the results of the interview;
- 15) approves materials on issues submitted for consideration by the Board of Directors and the Management Board of the Company;
- 16) initiates, in accordance with the established procedure, the issue of purchasing consulting services in the field of compliance within the approved budget;
- 17) develops proposals for improving the anti-corruption legislation of the Republic of Kazakhstan and sends them to the authorized anti-corruption body;
- 18) participates in the development of drafts of internal regulatory documents within its competence;
- 19) ensures the functioning of an initiative information channel for reporting on the existence or potential possibility of violations of anti-corruption legislation, corporate ethics and other abuses of employees of the Company's group;
- 20) makes proposals to improve the effectiveness of anti-corruption measures;
- 21) monitors the implementation of compliance policies and standards in subsidiaries and affiliates in order to ensure the effective functioning of the compliance system;
- 22) checks the knowledge of the Company's employees regarding their understanding and knowledge of anti-corruption legislation and internal regulatory documents on compliance and corporate ethics;
- 23) performs other powers that are not provided for in these Regulations, but do not contradict the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company, which are necessary for the proper performance of the compliance function, which are assigned to the Compliance Service on the basis of decisions, instructions of the Board of Directors and/or the Audit Committee, as well as the functions of the Samruk -Kazyna.

In carrying out its activities, the Compliance Service:

- 1) promptly informs the Audit Committee and the Board of Directors of the Company about any situations related to the existence or potential possibility of violations of anti-corruption legislation;
- 2) informs the authorized anti-corruption body about cases of corruption offenses that have become known, are being prepared, committed, or have been committed;
- 3) ensures confidentiality of persons who have applied for alleged or actual cases of corruption, violations of the Code of Business Ethics and other internal documents on anti-corruption issues;
- 4) complies with official and professional ethics, as well as the requirements of applicable internal regulatory documents of the Company;
- 5) constantly improves professional skills by participating in training events held by authorized bodies and professional organizations in the field of compliance.

3.3. Employees of the Compliance Service should not:

- 1) participate in reviews of processes they have participated in during the previous three years; engage in activities that could impair or be perceived as impairing the impartiality of the audit;
- 2) use confidential information for personal purposes.
- 3) accept gifts and use services that may result in damage to the independence, objectivity and impartiality of the Compliance Service, or that may be perceived as causing such damage;
- 4) take part in inspections, internal investigations, and other activities that may lead to a conflict of interest.
- 5) Employees of the Compliance Service are required to promptly inform the Head of the Compliance Service about any situations related to the presence or potential possibility of violation of the independence and/or objectivity of the work of compliance.
- 6) engage in activities that could impair or be perceived as impairing the impartiality of the audit;
- 7) use confidential information for personal purposes.
- 8) accept gifts and use services that may result in damage to the independence, objectivity and impartiality of the Compliance Service, or that may be perceived as causing such damage;
- 9) take part in inspections, internal investigations, and other activities that may lead to a conflict of interest.

3.4. Employees of the Compliance Service are required to promptly inform the Head of the Compliance Service about any situations related to the presence or potential possibility of violation of the independence and/or objectivity of the work of compliance.

4. Responsibility

4.1. The Head of the Compliance Service is responsible for the quality and timeliness of performance of the functions and tasks assigned to the Compliance Service in accordance with the legislation of the Republic of Kazakhstan, the employment contract and job description.

4.2. Employees of the Compliance Service are responsible for the quality and timely performance of the functions assigned to them, in accordance with the legislation of the Republic of Kazakhstan, employment contracts and job descriptions.

4.3. Employees of the Compliance Service are personally responsible for non-compliance and violation of the rules of labor protection, safety, fire safety, as well as for damage or improper treatment of the Company's property entrusted and assigned to them;

5. Compliance Service reporting

5.1. The Compliance Service periodically reports on the results of its activities to the Audit Committee and the Board of Directors of the Company.

5.2. The Compliance Service periodically sends information on the anti-corruption measures taken to the authorized anti-corruption body.

5.3. At the written request of the authorized anti-corruption body, additional information on the Company's anti-corruption measures is sent.

6. Procedure for making changes and additions to the Regulation

6.1. Amendments and additions to the Regulations are made in accordance with the procedure established in the Documented Procedure - General requirements for the development, execution and presentation of internal regulatory documents of the Company.

6.2. If, as a result of changes in the legislation of the Republic of Kazakhstan or the Company Charter, certain provisions of the Regulations come into conflict with them, these provisions become invalid, and

until changes are made to the Regulations, employees of the Service are guided by the current regulatory legal acts of the Republic of Kazakhstan and the Company Charter.

Have read and understood the Compliance Service Regulation

[illegible]

APPROVAL SHEET

№	Position	Full name	Signature (visa)
1.	Managing Director for Security, Risks and Legal Issues	Kaspakov M.K.	
2.	Corporate Security Director	Kalilulloev A.K.	
3.	Risk Management Department Director	Nugmanov A.B.	
4.	Legal Department Director	Zhunosova S.K.	
5.	Director of Project and Business Process Management Department	Yeskendirov A.K.	
6.	Head of the Compliance Service	Tairov A.S.	