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Annex to No. 6
to the decision of the Board of Directors
JSC “NC “QazaqGaz”
№ 10/25 dated 5th June 2025

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

ANTI-CORRUPTION POLICY
JSC “NC “QAZAQGAZ”


Copy: _____

Astana, 2025

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Introduced: instead of document П-14-23 JSC “NC “QazaqGaz” Anti-corruption Policy approved by the decision of QazaqGaz Board of Directors dated July 13, 2023 (Minutes of meeting No. 10/23)

Revision date: 2030

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1. Purpose and scope

1.1. This QazaqGaz Anti-Corruption (hereinafter referred to as the Policy) has been developed in accordance with the Law of the Republic of Kazakhstan “Concerning Corruption Control”, the standard ST RK ISO 37001-2017 “Anti-bribery Management Systems”, and other legislative acts of the Republic of Kazakhstan in the field of corruption control. The Code of Business Ethics, as well as internal regulatory documents regulating the activities of JSC “NC “QazaqGaz” (hereinafter referred to as the Company).

1.2. The Policy establishes the following:

- 1) basic principles of combating corruption in Society;
- 2) managerial and organizational bases for the prevention of corruption offenses;
- 3) measures to minimize and prevent acts of corruption;
- 4) procedure for conducting compliance checks/investigations on violations;
- 5) basis for the formation of employees' commitment to strict compliance with the laws of the Republic of Kazakhstan, as well as internal regulatory documents governing the Company's activities;
- 6) general principles of acceptance, giving of gifts, rendering and acceptance of acts of hospitality in the Company, as well as the activities of the structural divisions of the Company in the registration of gifts and the manifestation of acts of hospitality;
- 7) managerial and organizational bases for the prevention of corruption offenses;
- 8) measures to minimize and prevent acts of corruption;
- 9) procedure for conducting compliance checks/investigations on violations;
- 10) basis for the formation of employees' commitment to strict compliance with the laws of the Republic of Kazakhstan, as well as internal regulatory documents governing the Company's activities;
- 11) general principles of acceptance, giving of gifts, rendering and acceptance of acts of hospitality in the Company, as well as the activities of the structural divisions of the Company in the registration of gifts and the manifestation of acts of hospitality.


1.3. The main purpose of this Policy is to express the commitment of the Company and its officials and employees to high standards of conduct, conduct an open and honest business, strengthen business reputation and increase trust in the Company. The norms of this Policy and the Company's Code of Business Ethics complement each other. The Policy meets the objectives of the Company, provides a basis for setting, reviewing and achieving anti-corruption goals, includes the obligation to comply with the requirements of the anti-bribery management system, encourages confidential communication of one's doubts without reprisals, includes the obligation to continuously improve the anti-bribery management system, justifies the authority and independence of the Compliance Service and explains the consequences of non-compliance with this Policy.

1.4. This Policy is mandatory for review and strict observance by all associates, officials and employees of the Company (including outstaffing), affiliated companies of the Company, as well as other third parties with whom the Company establishes business or employment relations.

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

1.6. The Policy may be applied in the Company's subsidiaries and affiliates in accordance with the established procedure by developing and approving a similar policy or bringing the internal documents of the Company's subsidiaries and affiliates in line with this Policy. At the same time, the requirements stipulated by this Policy in similar policies and internal documents of the Company's subsidiaries and affiliates should not be lowered.

1.7. If the legislation of the countries where the subsidiaries and affiliates are located and the internal regulatory documents of the subsidiaries and affiliates establish stricter requirements than the provisions of the Policy, the provisions of the internal regulatory documents of the subsidiaries and affiliates or the requirements of the legislation shall apply.

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1.8. This Policy is available in Kazakh, Russian and English and is subject to posting on the Company’s corporate website.

2. Regulatory references

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


- Criminal Code of the Republic of Kazakhstan;
- Law of the Republic of Kazakhstan “Concerning Corruption Control”;
- Law of the Republic of Kazakhstan “Concerning Joint Stock Companies”;
- Corporate standard for the compliance function of the Samruk-Kazyna Group of Companies, approved by the decision of the Board of Samruk-Kazyna JSC dated December 21, 2023 (Minutes of Meeting No. 60/23);
- Corporate standard for the compliance function of the Company’s group of companies;
- Company Code of Business Ethics;
- Regulations on the Company Compliance Service;
- Rules for integrity check of the Company’s counterparties;
- Policy on resolving the conflict of interests of the Company;
- Anti-corruption standards of the Company;
- Rules for proactive public information;
- Standard ST RK ISO 37001-2017 “Anti-bribery management systems”;
- The standard for managing procurement activities of the Samruk-Kazyna National Welfare Fund Joint Stock Company and organizations with fifty percent or more of voting shares (participation interests) owned directly or indirectly by Samruk-Kazyna JSC on the right of ownership or trust management;
- Rules for anti-corruption monitoring and internal analysis of corruption risks in the Company;
- General requirements for the development, design and presentation of the Company's internal regulatory documents;
- Documentation management;
- Record management.

3. Terms and definitions


3.1. In this Policy, the terms and their corresponding definitions are used in accordance with Table 1.

Table L – Terms and definitions


Terms	Definitions
Administrative and economic functions	Right to manage and dispose of assets held on the Company’s balance sheet granted in accordance with the procedure established by the Law of the Republic of Kazakhstan and internal documents of the Company;
Anti-corruption legislation	Law of the Republic of Kazakhstan “On corruption control and other regulatory legal acts on corruption control
Anti-corruption monitoring	The Company’s activities in collecting, processing, summarizing, analyzing and assessment of information related to the effectiveness of anti-corruption policies, the state of law enforcement practice in the field of corruption control and prevention, anti-corruption measures, as well as the perception and assessment of the level of corruption in the Company.

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Anti-corruption restrictions	Restrictions established by the Law of the Republic of Kazakhstan “On corruption control” and aimed at preventing corruption offenses;
Associates	Members of the Board of Directors. Management Boards of the Company, agents, partners in joint ventures and other persons providing services for the Company or acting on its behalf;
Close relatives	Parents (a parent), children, adoptive parents, adopted children, full and half siblings, grandparents, grandchildren;
Internal analysis of corruption risks	The Company activities to identify and study the causes contributing to the commission of corruption offenses;
Officials	Board of Directors, the Management Board of the Company, and other persons in the Company who are equal to persons authorized to perform state functions in accordance with the Law of the Republic of Kazakhstan "On corruption control" and this Policy;
Persons who are equal 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 division;
Person performing managerial functions	A person, permanently, temporarily or by special authority performing organizational and administrative or administrative-economic functions in the Company;
Material remuneration	Material values, benefits or privileges transferred to the BENEFIT of or accepted from the 3 rd parties;
Compliance system or anti-corruption	System is a set of interrelated elements of the internal control system, policies, procedures, processes and measures taken by the Company to achieve its anti-corruption goals, as well as a set of preventive measures and preventive actions to prevent violations of anti-corruption legislation, requirements of regulatory documents of the Company in order to ensure high professional and ethical standards, minimize risks non-compliance with the law and prevention of material (financial loss or loss of reputation);
Conflict of interests	Conflict of interests 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 use of the Company's services. performance of their official duties;
Corruption	Illegal use by Company officials of their official (official) powers and related opportunities for the purpose of obtaining or extracting them personally, or through intermediaries of property (non-property) benefits and advantages for themselves or third parties, as well as bribing these persons by providing benefits and advantages;
Corruption risk	Possibility of occurrence of causes and conditions that contribute to the commission of corruption offenses;
Corruption actions	Intentional act (action or omission) committed by an official or employee of the Company, using his official position in order to obtain benefits in the form of property or other benefits;
Corruption offense	Illegal guilty act (action or omission) with signs of corruption, for which administrative or criminal liability is established by law;
Counterparty	A natural or legal person with whom the Company has concluded or is planning to conclude a contract/agreement;

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Anti-corruption restrictions	Restrictions established by the Law of the Republic of Kazakhstan “On corruption control” and aimed at preventing corruption offenses;
Associates	Members of the Board of Directors. Management Boards of the Company, agents, partners in joint ventures and other persons providing services for the Company or acting on its behalf;
Close relatives	Parents (a parent), children, adoptive parents, adopted children, full and half siblings, grandparents, grandchildren;
Internal analysis of corruption risks	The Company activities to identify and study the causes contributing to the commission of corruption offenses;
Officials	Board of Directors, the Management Board of the Company, and other persons in the Company who are equal to persons authorized to perform state functions in accordance with the Law of the Republic of Kazakhstan "On corruption control" and this Policy;
Persons who are equal 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 division;
Person performing managerial functions	A person, permanently, temporarily or by special authority performing organizational and administrative or administrative-economic functions in the Company;
Material remuneration	Material values, benefits or privileges transferred to the BENEFIT of or accepted from the 3 rd parties;
Compliance system or anti-corruption	System is a set of interrelated elements of the internal control system, policies, procedures, processes and measures taken by the Company to achieve its anti-corruption goals, as well as a set of preventive measures and preventive actions to prevent violations of anti-corruption legislation, requirements of regulatory documents of the Company in order to ensure high professional and ethical standards, minimize risks non-compliance with the law and prevention of material (financial loss or loss of reputation);
Anti-corruption restrictions	Restrictions established by the Law of the Republic of Kazakhstan “On corruption control” and aimed at preventing corruption offenses;
Associates	Members of the Board of Directors. Management Boards of the Company, agents, partners in joint ventures and other persons providing services for the Company or acting on its behalf;
Close relatives	Parents (a parent), children, adoptive parents, adopted children, full and half siblings, grandparents, grandchildren;
Internal analysis of corruption risks	The Company activities to identify and study the causes contributing to the commission of corruption offenses;
Officials	Board of Directors, the Management Board of the Company, and other persons in the Company who are equal to persons authorized to perform state functions in accordance with the Law of the Republic of Kazakhstan "On corruption control" and this Policy;
Persons who are equal 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 division;

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Person performing managerial functions	A person, permanently, temporarily or by special authority performing organizational and administrative or administrative-economic functions in the Company;
Material remuneration	Material values, benefits or privileges transferred to the BENEFIT of or accepted from the 3 rd parties;
Compliance system or anti-corruption	System is a set of interrelated elements of the internal control system, policies, procedures, processes and measures taken by the Company to achieve its anti-corruption goals, as well as a set of preventive measures and preventive actions to prevent violations of anti-corruption legislation, requirements of regulatory documents of the Company in order to ensure high professional and ethical standards, minimize risks non-compliance with the law and prevention of material (financial loss or loss of reputation);
Conflict of interests	Conflict of interests 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 use of the Company's services. performance of their official duties;
Corruption	Illegal use by Company officials of their official (official) powers and related opportunities for the purpose of obtaining or extracting them personally, or through intermediaries of property (non-property) benefits and advantages for themselves or third parties, as well as bribing these persons by providing benefits and advantages;
Corruption risk	Possibility of occurrence of causes and conditions that contribute to the commission of corruption offenses;
Corruption actions	Intentional act (action or omission) committed by an official or employee of the Company, using his official position in order to obtain benefits in the form of property or other benefits;
Corruption offense	Illegal guilty act (action or omission) with signs of corruption, for which administrative or criminal liability is established by law;
Counterparty	A natural or legal person with whom the Company has concluded or is planning to conclude a contract/agreement;
Organizational and administrative functions	The right granted in accordance with the procedure established by the Law of the Republic of Kazakhstan and internal documents of the Company to issue orders and
Anti-corruption	Activities of the Company and its officials and employees within the limits of their powers to prevent corruption, including the formation of an anti-corruption culture,
Representation expenses	Expenses for holding receptions, visiting cultural centers, etc.- entertainment events, buffet service, payment for translation services, etc.;
Worker	- A person who is in 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 / responsible structural division	A structural division of the Company that performs anti-corruption compliance functions in accordance with the anti-corruption legislation of the Republic of Kazakhstan, the Corporate Standard on Compliance Functions of Samruk-Kazyna Group of Companies and internal documents of the Company;
Relatives	full and half siblings, parents and children, spouse (-s).

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The definitions applied, but not disclosed in this Policy, correspond to the definitions used in the legislation of the Republic of Kazakhstan, the Charter and other internal documents of the Company.

4. Abbreviations and symbols

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

Table 2. Abbreviations and designations

No.	Designations and abbreviations	Full name of given designations and abbreviations
1	Subsidiaries and affiliates	Subsidiaries and affiliates, including jointly controlled entities and joint ventures of JSC “NC “QazaqGaz”
2	HR & R Department	Human Resources and Remuneration Department
3	Company	JSC “NC “QazaqGaz”
4	EDMS	QazaqGaz electronic document flow system

5. Responsibilities and authorities

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

5.2. The Head of the Compliance Service is responsible for managing this Policy in accordance with the requirements of the documented procedure DP-02 Document Management.

5.3. Responsibility for non-compliance with the requirements of this Policy is assigned to the Company officials and employees.

5.4. One of the employees of the Company Compliance Service is responsible for sending out this Policy.

6. General part

6.1. Basic principles of corruption control


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

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

The principle of zero tolerance for any manifestations of corruption means that associates, officials and employees acting on behalf of the Company or in its interests, directly or indirectly, personally or through any intermediary, are strictly prohibited from participating in corrupt activities, regardless of their business practices in a particular country;

2) **commitment of top management and setting “a tone at the top”** - The Company Board of Directors plays a key role in creating a culture of intolerance to corruption and creating a system for preventing and combating corruption in the Company. Members of the Board of Directors and the Management Board of the Company must openly and constantly declare their irreconcilable attitude to any form 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 the 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 anti-corruption restrictions provided for by the legislation of the Republic of Kazakhstan;

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4) **inevitability of punishment** - The Company declares the inevitability of punishment of officials and employees of the Company, regardless of their position, work experience and other conditions, in case they commit corruption offenses, corruption actions in the performance of their official duties, as well as failure to comply with the Company's internal documents on combating corruption, including records and memos of the Compliance Service;

5) **legality and compliance of this Policy with the current legislation and generally accepted norms** - The Company strictly complies with the anti-corruption legislation of the Republic of Kazakhstan and other countries in which it operates or plans to operate, and any of its actions or omissions do not contradict the norms of the applicable anti-corruption legislation;

6) **proportionality of procedures for preventing and combating corruption** - the Company develops and implements control procedures that 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 Company's activities;

7) **effectiveness of anti-corruption procedures** - The Company strives to make the procedures as transparent, clear, and feasible as possible, which ensure that they are easily implemented and achieve meaningful results. 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, monitors compliance with the implemented procedures for preventing and combating corruption and their effectiveness;

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

10) **due diligence** - the Company exercises due diligence when establishing / continuing business relationships with contractors, job candidates or other third parties, performing timely verification of their reliability and absence of conflicts of interest;

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

6.1.2. The Company's approaches to the organization of the corruption control system:

6.1.2.1. The Company Board of Directors:

1) ensures the provision of the necessary resources for the effective functioning of the compliance system;

2) approves the anti-corruption policy that defines the fundamental principles and methods of combating corruption, as well as other necessary documents in the field of compliance;

3) ensures consistency of the anti-corruption policy and other compliance documents with the company's goals and strategy;


4) monitors the development and implementation of the compliance system by the Company and its effectiveness, as well as the adequacy of allocated resources for its effective functioning;

5) monitors the effectiveness of the corruption management system;

6) periodically, but at least once a year, receives information from the Company's Management Board (analysis of the anti-corruption management system) on the development and functioning of the compliance system, and on measures taken in the field of anti-corruption;

7) periodically, but at least once a year, assesses the achievement of compliance and anti-corruption goals based on an internal audit or third-party analysis;

8) responsible for understanding, implementing, and meeting the requirements of the anti-bribery management system.

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6.1.2.2. The Company's Management Board is responsible for:

1) ensuring integration (integration) of the requirements of the anti-bribery management system into the Company's processes and taking the necessary measures for the effective functioning of the compliance system and function;

2) ensuring the development, implementation, management, maintenance and revision of the anti-bribery management system, including this policy and objectives, in order to respond appropriately to the Company's corruption risks;

3) providing sufficient and appropriate resources for the effective functioning of the anti-bribery management system;

4) informing and promoting a culture of compliance, anti-corruption and rejection of violations both within and outside the Society;

5) involving employees in the importance of effective anti-corruption management and compliance with the requirements of the anti-bribery management system, as well as targeting employees and supporting them to contribute to the effectiveness of the anti-bribery management system;

6) continuous improvement of the anti-bribery management system and encouragement of continuous improvement;

7) ensuring that employees are motivated to use proactive information tools (Hotline) about alleged or actual cases of corruption;

8) encourage confidential reporting of concerns without fear of reprisal, and ensure that no employees are harassed, discriminated against, or disciplined for reporting violations in the company, whether done in good faith or based on a reasonable assumption, or for refusing to engage in corrupt practices, even if such refusal may result in the following cases: lead to losses for the organization's business (except in cases where the person was involved in the violation).

9) providing assurance that the anti-bribery management system is designed to meet its objectives;

10) spreading a culture of rejection of corruption within the Society;

11) ensuring that other employees in their respective management positions are supported in demonstrating leadership in preventing and detecting corruption within the limits of their established responsibilities;

12) implementation of the anti-bribery management system and compliance with its requirements, ensures that responsibility and authority for relevant job functions are established and communicated to employees at all levels of the Company;


13) periodically, but at least once a year, conduct an analysis of the Company's anti-bribery management system functioning, as well as on suspicions of serious and/or systematic cases of corruption to ensure its continued suitability, compliance and effectiveness. The results of the analysis carried out by the Company Management Board should include decisions related to opportunities for continuous improvement and any needs for changes in the anti-bribery management system. The final results of the analysis conducted by the Company Management Board are sent to the Company Board of Directors.

6.1.2.3. The Company has established and operates a Compliance Service, the purpose of which is to support the Board of Directors and the Management Board of the Company in building an effective compliance system that provides reasonable assurance that significant compliance and corruption risks of the Company are properly managed. The goals and objectives of the Compliance Service are regulated by the Regulations on the Compliance Service.

6.1.2.4. The independence of the Compliance Service is achieved, inter alia, through:

1) approval by the Company's Board of Directors of the regulations and main compliance policies, operating procedures and plans of the Compliance Service;

2) regular receipt by the Company's Board of Directors of information on the status of compliance risks and the functioning of the compliance system in the Company;

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3) ensuring direct and prompt access of the Compliance Service to the Audit Committee of the Board of Directors, the Board of Directors of the Company, the Management Board of the Company to discuss the functioning of the anti-bribery management system, emerging restrictions and the issue or problem related to corruption or the anti-bribery management system;

4) sufficient authority and resources of the Compliance Service.

6.1.2.5. The independence of the Compliance Service is achieved, inter alia, through:

5) approval by the Company's Board of Directors of the regulations and main compliance policies, operating procedures and plans of the Compliance Service;

6) regular receipt by the Company's Board of Directors of information on the status of compliance risks and the functioning of the compliance system in the Company;

7) ensuring direct and prompt access of the Compliance Service to the Audit Committee of the Board of Directors, the Board of Directors of the Company, the Management Board of the Company to discuss the functioning of the anti-bribery management system, emerging restrictions and the issue or problem related to corruption or the anti-bribery management system;

8) sufficient authority and resources of the Compliance Service.

6.2. Corruption risk assessment

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

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 risks of non-compliance with anti-corruption legislation, and where there is a high probability of officials and employees committing corruption offenses, both for personal gain and for the benefit of the Company. At the same time, the manager responsible for risk identification and assessment, as well as for developing measures to reduce them, is the manager who oversees the analyzed business process.

6.2.3. Identification and assessment of corruption risks is carried out on the basis of anti-corruption monitoring and internal analysis of corruption risks and internal audit of the anti-bribery management system.

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

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

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

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


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

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

6.2.6. The results of anti-corruption monitoring can serve as a 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 Company activities, internal documents of the Company;

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- 2) identification of corruption risks in the Company's organizational and managerial activities;
- 3) identification of "critical points" in the business process that are most likely to cause corruption offenses;
- 4) description of corruption schemes that contain:
 - description of the benefit or advantage that can be obtained by the Company or its individual officials and employees when committing a corruption offense;
 - identification of positions subject to corruption risks, with the formation of their list;
 - possible forms of making corrupt payments;
- 5) determination of the presence or absence of internal control procedures, evaluation of the effectiveness of existing control procedures.

6.2.8. For any corruption scheme, a zero tolerance level for risk 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 and 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 identifying, analyzing and evaluating corruption risks, a register is compiled, including information on sources and situations of potential corruption violations, as well as control procedures and measures are developed to mitigate significant corruption risks and improve the effectiveness of the compliance system. For all identified significant compliance risks, it is necessary to identify the positions (persons) that affect its implementation.

6.2.11. Based on the results of anti-corruption monitoring and internal analysis of corruption risks, assessments of the effectiveness of the anti-bribery management system are made.

6.3. Verification of counterparties and cooperation

6.3.1. The Company makes reasonable efforts to minimize the risk of business relations with counterparties that may be involved in corrupt activities. For this purpose, the Company evaluates counterparties for possible involvement in corruption, including checking whether they have their own anti-corruption policies or procedures, their readiness to comply with the requirements of this Policy, provide mutual assistance for ethical business conduct and prevention of corruption, and include the following additions to the contracts:

- anti-corruption reservations in the form specified in Annex No. 4 to this Policy;
- Supplier's Code in the form specified in Annex 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 should be guided by the Rules for Verifying the reliability of the Company counterparties.

6.3.4. In case of identification of “risk factors”, the initiator of the contract and/or other agreement must necessarily bring the information to the direct manager for the Company to make an appropriate decision.


6.4. Participation in charitable, sponsorship and political activities

6.4.1. The Company may provide charitable assistance in accordance with the charity program approved by the Board of Directors of the Company, which provides for a limit on the amount of charitable assistance provided.

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

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

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6.5. Payment for simplification of formalities

6.5.1. This Policy prohibits paying or accepting payments as a reward for simplification of formalities. Facilitation payment means payments made to officials and employees to complete or speed up normal procedures. Payment for simplification of formalities differs from official fees for services, the amount of which is publicly available.

6.6. Gifting, receiving gifts, other services (courtesies)

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 financial remuneration, gifts or services provided for the actions (inaction) of these persons in favor of those who provided financial remuneration, gifts or services, if such actions (inaction) are included in the official duties. the authority of this person or he, by virtue of his official position, may contribute to such actions (inaction).

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

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

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

- 1) fully comply with 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 items.
- 3) do not represent a hidden reward for a service, act, omission, 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) the display of hospitality is not intended and cannot be perceived as intended to influence or induce a person to act in a particular way, or to reward that person for performing their role or function;
- 5) do not create 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) hospitality is appropriate and does not exceed the limits provided for in this Policy, and does not violate the hospitality policies of the relevant third-party organization.


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

6.6.6. It is not allowed to offer hospitality signs and gifts to civil servants, officials of quasi-public sector entities and their family members. It is also forbidden to offer or give gifts if it is known that accepting the gift is unacceptable for the donee.

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

6.6.8. If there are doubts about the compliance of a business gift or event with the requirements of this Policy, the employee should consult with the direct manager or responsible structural division on this issue.

6.6.9. Employees and officials of the Company avoid presenting and/or accepting gifts and hospitality in the performance of their official duties because such actions will have an undue influence or create the appearance of such influence on the Company employees, officials and business partners.

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6.6.10. .

6.6.11. When entering into a business relationship, employees are encouraged to familiarize their business partners with this Policy. If available, get acquainted with a similar internal document accepted from business partners, third parties.

6.6.12. If a gift in the form of cash or cash equivalents is received due to negligence, the employee must notify the head of their department in writing or (if the employee is the head of the department) to the Compliance Service and arrange for an immediate refund.

6.6.13. The employee must inform in writing 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 acceptance of the act of hospitality from a third party due to negligence:

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

6.6.14. The Compliance Service may conduct a preliminary assessment (gifts, entertainment expenses, acts of hospitality, etc.) for compliance with the criteria specified in sections 1-6) of subclause 6.6.4 of the Policy, which will exclude, including cases of acceptance of a hospitality act from a third party due to negligence.

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

6.7. Company leadership in corruption control in the Company group of companies

6.7.1. The Board of Directors and the Management Board of the Company demonstrate by personal example, and also require all employees to follow the anti-corruption principles specified in clause 6.1. of this Policy, including when interacting with employees of the Company group companies.

6.7.2. The Company assumes leadership and coordinates the activities of subsidiaries and affiliates in the field of anti-corruption.

6.7.3. The Company participates in the creation of an effective and efficient compliance system in the Company group companies through the approval of the Corporate Standard for Compliance Functions, as well as other interaction tools defined in the Company documents.

6.7.4. If necessary, joint working groups can be created to work on specific issues in the field of anti-corruption, as well as conduct compliance checks.


6.7.5. On an annual basis, the Company, through its representatives on the Boards of Directors / supervisory Boards, communicates its position on expectations regarding the measures taken in the field of anti-corruption, including the elimination of identified shortcomings, corruption risks, and factors contributing to the commission of corruption offenses.

6.7.6. In accordance with the Corporate Standard on the Company's compliance function, the first managers of portfolio companies may be heard on anti-corruption issues.

6.8. Handling requests from individuals and legal entities received under established procedures

6.8.1. Any violations, in particular non-compliance with the Code of Business Ethics, may cause significant damage to the Company's activities and reputation. In this regard, the Company requires employees and encourages third parties to express concerns about non-compliance with the Code of Business Ethics, requirements for combating corruption, fraud and bribery, and other violations.

6.8.2. In accordance with the established procedure, the Company operates a centralized initiative information line (hotline) of Samruk-Kazyna JSC, through which any employee, counterparty or other interested person (applicant) of the group of companies can report on the existence of reasonable suspicions and known facts of violations by the Company, its officials and employees of the applicable requirements of the legislation or internal documents, corruption crimes, illegal actions and other violations.

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6.8.4. Any employee or other associate who has concerns about matters covered by this Policy should report such concerns to the Compliance Service as soon as reasonably possible. Such concerns must be expressed in good faith, truthfully and without malicious intent.

6.8.5. The Company recognizes that it is important to increase confidence in the initiative communication line, so that employees and others can be sure that their messages will be properly considered. In this regard, Samruk-Kazyna is engaged by an external operator in accordance with the established procedure to provide employees and other associates with an opportunity to express their concerns to an independent third party, including on a confidential or anonymous basis (single hotline service). Such messages can be sent 24 hours a day, 7 days a week.

6.8.6. The Company provides a guarantee against harassment to a person who has reported any possible violation or expressed concern about other facts that directly or indirectly affect anti-corruption issues. Such a person should not be subject to disciplinary measures or attempts to dismiss or otherwise put pressure on him / her by the persons mentioned in his / her application at the time of the audit or after. A guarantee against harassment is also provided to a person who has conducted an audit or provided evidence of a possible violation within the scope of their duties provided for by applicable law, internal rules, or the Code of Business Ethics (assistance to the audit/investigation, by providing information, documents, explanations, etc.).

6.8.7. Consideration of requests from individuals and legal entities received within the framework of initiative information (hotline) is carried out in accordance with the Company's internal documents.

6.9. Procedure for compliance checks and investigations

6.9.1. This Procedure for reviewing appeals and conducting inspections and investigations is designed to regulate the process of reviewing compliance requests and instructions on possible violations of the legislation of the Republic of Kazakhstan and internal regulatory documents regulating anti-corruption issues; internal regulatory documents regulating business ethics, control over the disposal and use of insider and confidential information in companies of the Company's group, by conducting inspections and investigations.

6.9.2. The final result of reviewing applications / conducting inspections and investigations is:


- providing feedback - a written response (conclusion) on the substance of the issues raised in the requests specified in the instructions, taking into account the measures taken for earlier (if any) received requests from the same applicants;
- implementation, if necessary, of corrective actions aimed at minimizing and preventing compliance risks identified as a result of reviewing complaints / conducting inspections and investigations.

6.9.3. Principles of conducting inspections / investigations:

1) **principle of legality** - when conducting an audit / investigation, compliance with the procedure for reviewing and making decisions established by the legislation and internal regulatory documents of the Company's group companies must be ensured;

2) **principle of objectivity** - an impartial and unbiased analysis of all the circumstances of a possible violation must be provided. Potential conflicts of interest among the persons conducting the review / investigation should be carefully evaluated and excluded at the planning stage of the review / investigation. Any restrictions imposed during the course of conducting an audit / investigation on the persons conducting them must be brought to the attention of the Company Board of Directors and may be regarded as attempts to influence the objectivity and create obstacles in the investigation;

3) **principle of completeness** - during the inspection / investigation, all the essential circumstances of the violation must be established, the necessary data, documents and other evidence must be collected. All stages of the audit/investigation should be documented, and all collected materials should be retained by the Compliance Service within the time limits set by the nomenclature of cases. If during the course of conducting an audit / investigation, circumstances become clear that indicate a potential or actual violation of the law, the Code of Business Ethics, or applicable internal regulatory documents that were not mentioned in the appeal, they should also be checked and investigated.

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To ensure compliance with the principle of completeness when conducting an audit / investigation, the Company's Compliance Service and all persons / divisions involved in conducting an audit / investigation have unrestricted access to information, employees of the Company's group companies and third parties, when such access is agreed upon in a contract or other written agreement with a third party;

4) **principle of timeliness** - conducting an inspection / investigation should be carried out within the time limits established by this procedure, taking into account the time limits established by law;

5) **confidentiality principle** - data about the applicant is transmitted exclusively on the principle of “only those who need to know” and may be disclosed by decision of the Company's Compliance Service only to the investigation group / group of auditors or the Company's Board of Directors. As an exception, it is allowed to disclose information to other persons not specified in this paragraph, if this is necessary to ensure an effective “guarantee against harassment”, that is, to ensure the applicant's immunity from prosecution for reporting a violation.

6) **guarantee against harassment (immunity of applicant)** - at the same time as the start of the inspection / investigation, the applicant is informed that if disciplinary measures are applied against him at the time of the inspection / investigation or after they are carried out, including the initiation of termination of employment relations or other pressure is exerted on him by persons involved in the investigation. in the case of the Applicant's request, the applicant must immediately notify the Company Compliance Service. A guarantee against harassment is also provided to persons who conducted an inspection / investigation or provided evidence of a possible violation (information, documents, explanations, etc.) within the scope of their competence / official duties.

6.9.4. The Company promotes the creation of an open environment in which employees, contractors and any third parties are encouraged to express their concerns regarding the compliance of the Company's group companies with the legislation, Anti-Corruption Policy, Code of Business Ethics, applicable internal regulations, anti-corruption restrictions and rules in the Company's group companies, by informing them through any channels and without fear of prosecution.

6.9.5. All requests are subject to comprehensive verification, regardless of whether the applicant is anonymous or identifiable.

6.9.6. The grounds for conducting a compliance investigation may include:


- order of the Audit Committee of the Company's Board of Directors;
- order of the Company's Board of Directors;
- protocol assignment of the Chairman of the Management Board of the Company or a person performing his duties;
- administrative document of the Chairman of the Management Board of the Company or the person performing his duties;
- resolution of the Chairman of the Management Board or the person performing his duties at the address;
- requests received through the initiative information system (hotline);
- according to reports of corruption offenses, violations of the Code of Business Ethics, received in other ways.

6.9.7. The decision to conduct a compliance investigation is made in the form of:

- order of the Chairman of the Management Board of the Company or a person acting as such;
- written instructions from the Chairman of the Board of Directors of the Company;
- other authorized person acting on the basis of a power of attorney issued by the Chairman of the Management Board of the Company.

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

6.9.9. Any person who has sufficient grounds to believe that an illegal act has been committed should not attempt to independently verify or investigate, or discuss the information received with other persons.

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6.9.10. Employees performing compliance checks / investigations guarantee confidentiality of information about all officials, employees, and other persons (contractors) who have reported violations in good faith.

6.9.11. As part of inspections and investigations:

- applicable laws, internal regulatory documents - procedures, corporate standards and rules, including those in force at the date / period of the alleged violations, are reviewed.

- interviews are conducted, including with the owners of processes, authors of documents, as well as with persons mentioned in the appeal or with the involved persons identified during the investigation. The results of the interview are recorded in the form of a questionnaire (question-answer) compiled by the examiner or reflected in the final document of the investigation:

- if necessary, by the decision of the head of the inspection group, a survey can be conducted among the company's team/divisions or its part (the object of inspection). The survey is conducted in two ways: open (respondents indicate their full names) and closed (without specifying their full names). It is possible to use one or two methods simultaneously (with a time difference).

- documents, photos and videos, correspondence and explanations, background information, and other materials related to the issues being reviewed are requested. Explanations on the issue of the request are provided by persons at the request of the examiner: orally at the oral request, in writing (signed by the person providing explanations to the head of the checking group) upon receipt of a written request. The request is signed in writing by the head of the checking group, if the head is not present, by one of the checking persons of the group. Reference information is provided under the signature of the head of the inspection object or the responsible person.

6.9.12. All activities carried out during the investigation should be properly documented. All documents, including explanations considered in the course of the investigation and their copies, are kept on paper in the Company Compliance Service for the time periods established by the nomenclature of cases.

6.9.13. The deadline for submitting documents and information required for conducting an investigation is three business days from the date of receipt of the request and may be extended by agreement with the Company's Compliance Service. At the same time, it is not recommended to extend the deadline for a long time, as this may lead to delaying the time of the investigation, as well as possible manipulations with documents, their adjustments, making changes to already compiled documents, creating missing documents, and so on.


6.9.14. Compliance inspections and investigations are carried out by the Compliance Service, if necessary, with the involvement of representatives of the Company's structural divisions and/or subsidiaries and affiliates with control functions (employees of other structural divisions and/or subsidiaries and affiliates engaged by the Compliance Service are guided by this procedure).

6.9.15. When conducting compliance checks and investigations, potential conflicts of interest should be excluded.

The following must be excluded from the group:

- persons specified in the request / materials to the order (hereinafter referred to as the persons involved);
- persons who are directly / indirectly subordinate to the defendants or their direct / indirect supervisors;
- persons indicated in the request / materials to the assignment as having biased judgments, including due to the presence of kinship relations with the persons involved;
- persons, members of the checking investigation team, who allowed the disclosure of confidential / official information to the persons of the object of verification.

If, during the course of the audit / investigation, the persons conducting them have grounds for self-recusal (for example, it is necessary to draw conclusions regarding their own professional conclusions and actions previously performed), then the person must declare self-recusal by submitting a written application addressed to the head of the Company Compliance Service.

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6.9.14. When conducting inspections and investigations, the Compliance Service has the right to:

- 1) access to any information and materials necessary for conducting an audit/investigation;
- 2) receive written explanations from officials and employees of the Company and its subsidiaries and affiliates regarding the ongoing audit / investigation.

If the employee and/or the official subject to the compliance check/investigation refuses to provide written explanations, a report is drawn up in any form, which indicates: the place, date and time of drawing up the report, the position, surname, first name and patronymic (if any) of the Compliance Service employee who drew up the report, and employees who were present when they refused to give written explanations.

The report is signed by the Compliance officer 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 its subsidiaries and affiliates;
- 4) get advice from specialists on issues that require special knowledge;
- 5) in accordance with the established procedure, get acquainted with documents (including confidential ones) related to the inspection/investigation, if necessary, attach copies of them or extracts from them to the materials of the inspection / investigation;
- 6) make a proposal to bring to justice employees of the Company who have committed a disciplinary offense, and / or to recover material damage caused to the Company;
- 7) to attract internal and external specialists to perform their functions of conducting inspections/investigations in accordance with the procedure established by internal documents;
- 8) freely express and disclose the results of the audit/investigation to authorized officials of the Company;
- 9) on material resources that should be sufficient and appropriate for the effective conduct of the audit / investigation;
- 10) submit to the Company's management, independently or jointly with other divisions and officials, recommendations to eliminate identified violations and shortcomings in the work of individual employees and divisions of the Company, as well as recommendations to optimize the work of these divisions that became known during the audit/investigation;
- 11) take other actions related to the exercise of their functions.

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


- 1) fact of committing an illegal act/omission and / or a disciplinary offense by the employee;
- 2) reasons and conditions that contributed to the commission of an illegal act/omission and / or a disciplinary offense by the employee;
- 3) nature and amount of damage caused to the Company and/or its subsidiaries and affiliates as a result of an illegal act/omission and/or by an employee as a result of a disciplinary offense.

6.9.16. Persons performing compliance checks/investigations, for non-fulfillment of their duties when conducting compliance checks / investigations, bear responsibility established by the legislation of the Republic of Kazakhstan and internal documents of the Company.

6.9.17. Officials and employees of the Company and its subsidiaries and affiliates should not interfere with the activities of persons performing compliance checks/investigations and other compliance procedures.

6.9.18. Upon completion of the compliance review / investigation, the Compliance Officer responsible for the event prepares a report.

The conclusion indicates the nature of the established disciplinary and other illegal actions/omissions, their consequences, what materials confirm or exclude the guilt of the Company's employee, circumstances that aggravate or mitigate his/her responsibility, reasons and conditions that contribute to the disciplinary offense of the Company employee and / or subsidiaries and affiliates, and other illegal actions/omissions, measures taken or proposed to eliminate them.

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If it is established that an employee who is subject to an inspection/investigation has committed a disciplinary offense, depending on the severity of the offense and the degree of guilt, the report reflects suggestions on the application of a specific type of disciplinary penalty.

Disciplinary action is carried out in compliance with the legislation of the Republic of Kazakhstan.

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

For unconfirmed claims, the reasons for non-confirmation are set out. In relation to the statements that cannot be confirmed or refuted, the substantiation of the circumstances for which the facts indicated in the information/appeal cannot be confirmed or refuted is indicated.

6.9.20. In case of detection of signs of a criminal or administrative offense during the compliance check / investigation, the materials of the compliance check/investigation are transferred to the relevant law enforcement agencies for decision-making.

The decision to transmit the compliance review/investigation report and related materials is made by the Company management.

6.9.21. The Company's Compliance Service may take into consideration any request made against the Company and its subsidiaries and affiliates, or decide to establish a review / investigation group, or include employees of the Company and its subsidiaries and affiliates in such groups.

6.10. Provision of anti-corruption activities by the Company

6.10.1. The Board of Directors and the Management Board of the Company contribute to creating an effective environment for anti-corruption activities, including by providing a sufficient number of employees with appropriate qualifications, providing appropriate working conditions, access to information systems, external and internal means of communication for information exchange, and allocating the necessary funding.

6.10.2. In order to ensure and maintain the necessary level of awareness of the Company's personnel, the Company regularly provides employees with information and training on anti-corruption issues.

6.10.3. The Company takes measures to automate and digitalize anti-corruption processes to ensure their high efficiency and transparency.

6.11. Responsibility


6.11.1 Officials and employees bear criminal, administrative, civil and disciplinary responsibility for committing corruption acts, corruption offenses in accordance with the legislation of the Republic of Kazakhstan. Officials and employees are subject to disciplinary liability, including for violating the requirements for compliance with and compliance with this Anti-Corruption Policy of the Company and the standard of ST RK ISO 37001-2017: Anti-Bribery Management System.

6.11.2. Persons who have been subjected to appropriate measures of responsibility for committing corruption offenses are not exempt from compensation for material damage to the Company, except by a court decision that has entered into legal force.

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

6.11.4. Officials (candidates) are required to confirm in writing the adoption of anti-corruption restrictions in accordance with Annex No. 3 to this Policy.

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

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6.11.6. When performing their official duties, the Company's officials and employees are obliged to:

- 1) get acquainted with the Policy, sign a commitment to comply with the Policy in accordance with Annex No. 1 to the Policy and submit it to the HR & R;
- 2) was guided by the Company's internal anti-corruption documents, records and memos of the Compliance Service for compliance with anti-corruption legislation;
- 3) take into account compliance with the Policy when evaluating the employee's business qualities, including in the case of his appointment to a higher position, solving other personnel issues;
- 4) strictly observe the restrictions and requirements stipulated in the Policy, including those related to giving and receiving gifts; performing representative expenses, charitable and sponsorship activities; participating in political activities; interacting with state representatives, persons subject to the Law of the Republic of Kazakhstan “On corruption control”, public organizations, contractors, intermediaries, third parties, avoiding conflicts of interest; and maintaining accounting records.

6.11.7. Officials and employees of the Company must strictly observe the categorical prohibition on the following actions:

- 1) participate in corrupt practices, including not offering, promising, or giving bribes;
- 2) ask for and receive bribes (commercial bribery);
- 3) participate in commercial bribery of contractors or contractors of employees/officials;
- 4) make payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of cash or cash equivalents, valuables, services or other benefits of a property or non-property nature, to any persons and from any persons or organizations, including commercial and non-commercial organizations, government bodies and local self-government bodies. local self-government bodies, persons subject to the Law of the Republic of Kazakhstan “On corruption control”, in order to obtain benefits for themselves, for Society or for third parties.

6.11.8. When performing their official duties, officials must strictly observe the categorical prohibition on requesting and receiving bribes from the Company's counterparties and other third parties; comply with the requirements and restrictions of an anti-corruption nature established by other internal documents of the Company (in the part that does not contradict the Policy).


6.11.9. When interacting with Counterparties, the Company's employees should establish and maintain business relations with those Counterparties that conduct business relations on a fair and honest basis, take care of their own reputation, demonstrate support for high ethical standards in conducting business activities, and implement their own anti-corruption measures.

6.11.10. HR&R is responsible for compliance with the norms of the Labor Code of the Republic of Kazakhstan regarding anti-corruption restrictions, for recording in writing the adoption of anti-corruption restrictions by officials and publishing information provided for by the anti-corruption legislation.

6.11.11. The Compliance Service is responsible for conducting corruption risk assessment and anti-corruption monitoring, as well as, within its competence, monitoring compliance of the Company's officials and employees with all other requirements of the anti-corruption legislation.

6.11.12. Contract initiators are responsible for including in contracts concluded with Counterparties the Supplier's Code in accordance with Appendix No. 5 and the anti-corruption clause in the form provided for in Annex No. 4 to this Policy, unless a different form of clause is provided for in the procurement contract templates in accordance with the Procurement Management Standard of the National Welfare Fund Samruk-Kazyna and organizations fifty or more percent of the voting shares (stakes) of which are directly or indirectly owned by JSC Samruk-Kazyna on the right of ownership or trust management.

6.11.13. Heads of structural divisions are responsible for ensuring that the requirements of the anti-bribery management system are applied and correspond to the functions of the structural division.

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6.11.14. The Board of Directors, Management Board and employees of the Company are responsible for understanding, complying with and complying with the requirements of the anti-bribery management system insofar as they relate to their role in the Company.

6.12. Final provisions

6.12.1. 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 Company Compliance Service of all cases of their inciting to commit corruption offenses, in accordance with the Company internal documents.

6.12.2. In case of doubts about the legality of the actions of other employees/officials of the Company, as well as counterparties, possible corruption actions and other corruption offenses, including embezzlement, fraud, bribery, commercial bribery, conflict of interests, etc., the employee / official, counterparty, shareholder or other person may report (including anonymously) report your concerns to the Company Compliance Service.

7. Records


7.1. This Policy does not contain records that must be managed in accordance with the requirements of the documented procedure DP-03 Records Management.

8. Revision, modification, storage and distribution

8.1. Revision, modification, storage and distribution of this Policy is carried out in accordance with the requirements of the documented procedure “Document Management” (DP-02).

8.2. The original paper version of this Policy is drawn up and stored in the Company ISM OSP.

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

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Annexes


Annex 1

*Use this form to confirm that you have carefully studied, understood and agree to comply in good faith with the requirements set out in the Anti-Corruption Policy of JSC “NC “QazaqGazQazaqGaz»
The completed and signed commitment form is filed with the employee's personal file by the HR&R.*

COMMITMENT for compliance with JSC “NC “QazaqGaz” Anti-Corruption Policy

Please mark the corresponding cells

- I confirm that I have studied and understood QazaqGaz Anti-Corruption Policy of (hereinafter referred to as the Policy).
- I undertake to strictly follow the requirements established by the Policy and the standard of ST RK ISO 37001-2017: Anti-Bribery Management System, including:
 - ✓ do not participate in corrupt practices directly or indirectly, personally or through the Mediation of third parties, including offering, giving, promising, requesting or receiving bribes and payments to simplify formalities in any form (incentive payments), including in the form of money, valuables, services or other forms of benefits to any persons and from any persons or organizations, including commercial organizations, government and self-government bodies, Kazakh and foreign civil servants, private companies and their representatives.
 - ✓ refrain from behavior that may 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” and the group of companies of JSC “NC “QazaqGaz”.
 - ✓ immediately inform your immediate supervisor and the person responsible for monitoring compliance with the Policy:
 - on cases of inducement of an employee to commit corruption offenses;
 - 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 or a conflict of interest that has arisen for the employee.
- I have been informed that if I violate the anti-corruption requirements of Kazakhstan and other applicable legislation, as well as the Policy and standard of ST RK ISO 37001-2017: Anti-Bribery Management System, I may be subject to disciplinary, civil, administrative and criminal liability, including release from criminal liability. in accordance with the procedure established by legislative acts of the Republic of Kazakhstan.
- I am familiar with the possibility to contact the hotline using the following details: by phone number: +7 800 080 4747; to the email address: mail@sk-hotline.kz via the internet portal: www.sk-hotline.sk-hotline.kz; via WhatsApp Messenger: with by phone number +7 771 191 8816, QazaqGaz Compliance Service about any suspicions about the legality or ethics of their actions, as well as actions, omissions or suggestions of other employees, contractors or other persons who interact with QazaqGaz and the group of companies of QazaqGaz.


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- It has been clarified to me that no Employee of QazaqGaz, including myself, will be sanctioned or prosecuted by QazaqGaz, if they report the alleged fact of corruption, or if they refuse to give or receive a bribe, commit commercial bribery, or otherwise mediate in bribery in particular, as a result of such refusal QazaqGaz lost profit or did not gain commercial and competitive advantages.
- It was explained to me that if I have additional questions about the principles and requirements of the Policy, the standard of ST RK ISO 37001-2017: Anti-bribery Management System, and the applicable anti-corruption legislation, I can contact the QazaqGaz Compliance Service.

Please sign here

(EDS signature)


_____ “___” 20___ **FULL NAME,**
Signature/EDS signature

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Annex No. 2

Log of Registration of Gifts and Acts of Hospitality Form

№ n/	Date of provision the act of hospitality, receiving the gift	Full name and position of person who submitted the notification of receiving the gift	Name of gift, description of act of hospitality	Full name and position of person who received the gift	Name, full name of giver	Special marks
1	2	3	4	5	6	7

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Annex No. 3

Form - Consent to the adoption of anti-corruption restrictions and confirmation of information accuracy

**Consent to the adoption of anti-corruption restrictions
and confirmation of the accuracy of information**

I,

(last name, first name, patronymic)

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


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

(specify the company)

in order to comply with the requirements of the Law of the Republic of Kazakhstan “On Corruption Control” dated 18 November 2015 No. 410-V (hereinafter referred to as the Law), other by-laws and internal regulatory documents of the group of companies of JSC “NC “QazaqGaz”, to prevent the commission of actions that may lead to the use of my powers for personal, group purposes 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 their functions;
- 2) it is unacceptable to serve (work) close relatives, spouses, and relatives together, including in the same structural division and have close relatives, spouse, and (or) relatives directly subordinate, or in different divisions, if the position is functionally related (in terms of business processes and procedures) to the positions held by their respective employees. close relatives, spouses and in-laws;
- 3) use of official and other information that is not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
- 4) acceptance of material remuneration, gifts or services for actions (omissions) in favor of the persons the powers of the persons specified in the first paragraph of this paragraph, or these persons, by virtue of their official position, may contribute to such actions (inaction);
- 5) participation in gambling and (or) betting in gambling establishments that fall under the definition

provided for by the Law of the Republic of Kazakhstan “On Gambling Business”, as well as participation in gambling and (or) betting in non-designated places or in gambling and (or) betting conducted through the use of telecommunications networks, including the Internet.

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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 who has been deprived of the right to hold any positions for a certain period of time by a court decision that has entered into legal force, and/or has been brought to criminal/administrative/disciplinary responsibility and has a criminal record, as well as a person who has been brought to responsibility for committing a corruption offense.

I undertake to notify the organization's management in writing about my close relatives, spouse, and / or in-laws working in this organization **before being hired or within one business day** from the date of occurrence of such a circumstance. I am informed that if I do not voluntarily remove such violation within three months from the moment of detection of the specified violation, then I will be transferred to positions that exclude such subordination, and if such transfer is not possible, then one of such employees is subject to dismissal from the position or other dismissal from the specified functions.

I have been 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 accordance with the procedure established by the legislation of the Republic of Kazakhstan.

I have been notified that money received to my account or the accounts of my family members without our knowledge, as well as funds received by me or them in violation of sub-paragraph 4) of paragraph 1 and paragraph 5 of Article 12 of the Law, **are subject to transfer to the republican budget within no more than two weeks** after their discovery, with the submission of explanations to the relevant state revenue authority about the circumstances of receipt of such funds.

I have been notified that gifts received without my or my family members knowledge, as well as those received by me and them in violation of sub-clause 4) of clause 1 and clause 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 we became aware of receiving the gift, and the services rendered to the specified persons under the same circumstances must be paid for by transferring money to the republican budget **within seven calendar days** from the date of rendering the service or from the day when the person specified in the first paragraph of paragraph 1 of Article 12 of the Law became aware of the provision of the service.

At the same time, the person who transferred the gift to the authorized state property management body has the right to redeem it at the price determined in accordance with the Law of the Republic of Kazakhstan “On Valuation Activities in the Republic of Kazakhstan”, on the basis of a purchase and sale agreement concluded with the authorized state property management body. The proceeds from the sale of gifts are transferred to the republican budget.

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

I have been notified that failure to comply with anti-corruption restrictions entails refusal to accept a position or dismissal from a position, and failure to comply with them in cases where there are no signs of a criminal offense or an administrative offense is grounds for termination of employment relations.


_____(Position)

Full name (specify in full)

Date

Signature/EDS signature

This form can be changed in agreement with the Compliance Service in case of changes to the anti-corruption legislation of the Republic of Kazakhstan.

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Annex No. 4
Anti-Corruption Clause Form

Anti-corruption clause

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

2. The Counterparty undertakes to comply with and ensure compliance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan, the standard of ST RK ISO 37001-2017: Anti-bribery management System, as well as not to commit corruption offenses provided for by international and foreign laws on anti-corruption applicable for the purposes of the agreement, and to comply with the guarantees of this clause.


3. The Counterparty confirms that it is not a person associated with the state and has no persons subject to the Law of the Republic of Kazakhstan "On Corruption Control", who are its officials, employees or direct or indirect owners. The Counterparty undertakes to immediately inform the Company in writing about all cases when any person subject to the Law of the Republic of Kazakhstan "On Corruption Control" becomes an official or employee of the counterparty or acquires a direct or indirect interest in the counterparty's organization.

4. In fulfilling their obligations under the Agreement, the Parties and their employees do not pay, offer to pay or permit the payment of any monetary funds or valuables, directly or indirectly, to any persons in order to influence the actions or decisions of these persons in order to obtain any undue advantages or other improper purposes.

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

6. Each of the Parties to the Agreement refuses to provide incentives in any way to the employees of the other Party, including by providing monetary amounts, gifts, gratuitous performance of works (services) addressed to them, 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 stimulating Party.

7. If the 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.


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8. In the written notification, the Party is obliged to refer to facts or provide materials that reliably confirm or give reason to assume that there has been or may be a violation of any provisions of these terms by the counterparty, its employees, which is expressed in actions qualified by applicable law as giving or receiving a bribe, commercial bribery, as well as actions that violate the requirements of legislation and international acts on countering the legalization of proceeds from crime.

9. The Counterparty undertakes to provide assistance and assistance to the Company in good faith in case of actual or possible violation of the requirements of this Anti-Corruption Clause.

10. To report cases of violation of requirements, the Counterparty is obliged to use the Hotline, 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 by agreement of the parties to the Agreement.

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Annex No. 5

JSC “NC “QazaqGaz” Supplier Code

1. Goal

1.1. The Supplier Code of JSC “NC “QazaqGaz” (hereinafter referred to as the Supplier Code) contains minimum standards that JSC “NC “QazaqGaz” (hereinafter referred to as the Company) requests to observe and respect in the framework of joint commercial activities with the Company.

1.2. Sustainable business development is a key pillar of the Company's strategy, which aims to respond strongly to the social needs and expectations of Society's stakeholders.

2. Main provisions

2.1. The standards set out in the Supplier Code reflect the Company's expectations of the Supplier with whom Общес твоеit works, including its subsidiaries and affiliates, as well as other parties with whom the Supplier does business, including all its employees (including permanent and temporary employees).

2.2. The Company's Supplier must comply with the requirements of the legislation of the Republic of Kazakhstan, other applicable legislation, the standard of ST RK ISO 37001-2017: Anti-Bribery Management System, internal documents of the Company, and in particular the principles set out in this document.

2.3. All actions related to business information and reporting must be performed fairly and faithfully, and comply with all applicable laws governing their execution and accuracy.


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

2.5. The Supplier is responsible for distributing, making known and thoroughly verifying compliance with the provisions of this Supplier Code by its employees.

3. General principles

The Company's Supplier complies with the following:

- does not allow corruption offenses in its 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;
- excludes child labor;
- excludes any kind of discrimination, including in relation to employment and employment activities;
- complies with regulatory legal acts concerning the minimum wage;
- complies with the labor legislation of the Republic of Kazakhstan and/or any other country where it operates.

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4. Anti-corruption requirements

4.1. All forms of corruption, including extortion, bribery, facilitation payments, fraud, money laundering and nepotism in the Supplier's activities are strictly prohibited.


4.2. If the Company has objective suspicions and evidence that the Supplier has violated the requirements of this Annex, such violation is considered a material violation of the Agreement, and the Company has the right to suspend payments or terminate this Agreement without prejudice to the Company's rights provided for in this Agreement or the legislation of the Republic of Kazakhstan. In addition, if any such violation results in a criminal offense for the Company, this Agreement will be immediately suspended and / or terminated upon notification to the Supplier, regardless of any right to correct such violation that may be provided for in other provisions of this Agreement.

4.3. In order to meet the above requirements, the Supplier must ensure that any natural or legal person engaged by the Supplier to provide services under this Agreement acts solely on the basis of a written agreement that provides for the same responsibilities and obligations as those imposed on the Supplier in accordance with this Annex, while the Supplier continues to be responsible for compliance and the fulfillment of these conditions by such persons, as well as bear direct o i responsibility to the Company in case of their violation.

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

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

- do not offer, promise, give, demand or receive bribes or other corrupt payments, including to any official;
- do not intentionally or negligently commit actions that may lead to a violation by the Supplier or the Company, or by any of their direct or indirect shareholders, directors, officers or employees, of the anti-corruption legislation of the Republic of Kazakhstan;
- must indicate 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 holders of shares in a company listed on a stock exchange);
- must inform the Company whether the Supplier is now or will become in the future the employer of any person holding a responsible public position, persons equated to them, and immediately notify the Company of any changes in such relations;
- should accept payments from the Company, unless they are made in non-cash form or by other traceable means of payment to the Supplier's bank account in the Supplier's country of 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, any charges brought against the Supplier in the course of judicial, arbitration or administrative proceedings, or in the event of an investigation into such charges 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, should cooperate in good faith with the Company and its representatives to establish the fact of such violation;
- We agree that the audit can only be carried out by employees of the Company or by a third-party professional organization engaged by the Company on the basis of a corresponding agreement. All expenses related to the audit are borne by the Company, except for cases when the audit reveals a significant violation by the Supplier of the terms of this Agreement. In this case, all costs associated with its implementation are borne by the Supplier.

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4.6. The supplier establishes a complete prohibition for its employees to offer, request, grant or accept, directly or indirectly, payments, gifts or privileges in exchange for favorable treatment in order to influence the transaction or to obtain personal or business benefits. This requirement applies to both employees and family members of employees of the Supplier and its co-executors.

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

4.8. The supplier must implement an anti-corruption program based on the legislation of the Republic of Kazakhstan and international standards. The program, which includes appropriate practical and informational training, should be transparent and effective.

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

4.10. The Supplier undertakes to ensure that the Company discloses and verifies 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 travel, accommodation, 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 situations that may constitute a conflict of interest and that may affect the business relationship, and prevent such situations.

5.2. When carrying out activities, the Supplier should make decisions based only on objective criteria. Any factors that may affect the Supplier's decision-making due to a conflict of personal, commercial or other interests should be excluded at the very beginning.

5.3. If the Supplier's employee 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 Contract or the conduct of business relations, the Supplier must inform the Company's management about this.

6. Human rights and working conditions


6.1. The supplier must provide all employees with appropriate working conditions and ensure that all employees labour rights are respected.

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

6.3. The supplier should not require employees or potential employees to pass medical tests, including pregnancy tests, unless this is required by applicable law or regulations, or if it is necessary to ensure workplace safety. The supplier must not discriminate based on test results.

6.4. The provider must create an accessible environment for people with disabilities in accordance with legal requirements.

6.5. The supplier is prohibited from using forced labor, prisoner labor, human trafficking, or commercial sexual services. It is prohibited to use all forms of forced labor, including bonded labor, forced labor (including slavery) or other forms of forced labor. Support or participation in any form in 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 must not use the work of children or minors, except in cases where it is allowed to enter into an employment contract in accordance with applicable law.

6.7. All employees of the Supplier must have a signed agreement. The employment contract must set out all the basic conditions, including the length of working hours, compensation for working overtime, the notice period, the amount of salary and frequency of payments, as well as other conditions provided for by applicable law.

6.8. The supplier complies with regulatory legal acts concerning employees working hours and rest periods, as well as other obligations of the employer.

6.9. The Supplier complies with the regulatory legal acts of the Republic of Kazakhstan concerning the minimum wage established by the legislation of the Republic of Kazakhstan. Working overtime, working on weekends and holidays, or at night is paid in an increased amount in accordance with the terms and conditions of the employment or collective agreements and /or the employer's act.

6.10. The supplier provides employees with an opportunity to know and fully understand the rights and obligations of employees 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, or physical, sexual, and/or psychological harassment.

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

7. Occupational health and safety


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

7.2. The Company's supplier must ensure working conditions, employees must be familiar with information on occupational health and safety, and receive appropriate training, including on fire safety, radiation safety, proper handling of chemicals and equipment, and emergency preparedness and first aid.

7.3. Potential risks that may lead to accidents/injuries or occupational diseases among the Supplier's employees should be assessed and controlled through appropriate preventive actions (e.g. design, engineering, administrative control, preventive maintenance, occupational 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 socio-psychological diseases, in order to minimize the factors inherent in dangerous types of work. The supplier must provide its employees with appropriate personal protective equipment at no additional cost. Any incident or accident resulting in physical injuries, as well as social and psychological illnesses, must be documented and brought to the attention of the Supplier's senior management.

7.5. The Company is actively engaged in continuous improvement of safety in the Company, ensuring the safety of its employees, and obliges its business partners to do so. When performing work on production sites, the Supplier complies with high standards of occupational health and safety, and is responsible for providing immediate notification of an emergency.

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8. Environmental protection

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

8.2. The supplier must 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 produced during the performance of the contract, and also ensures the disposal of such waste without causing much harm to the environment.

8.4. The supplier must take measures to prevent the use of toxic substances. If there is no alternative, the Supplier must minimize the use of toxic substances and ensure safe handling and disposal. For other harmful substances, elements or restricted waste, the Supplier must strictly comply with all applicable legal regulations.

8.5. The supplier develops both environmental-friendly technologies (for example, controlling pollutants, releasing carbon dioxide), as well as energy-saving and waste management technologies, and implements logistics strategies that reduce their negative impact on the environment (especially with regard to storage, transshipment and transportation).

9. Privacy and data security

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

9.2. The supplier must use systems that guarantee the safety and security of client data, and prevent confidential data from being leaked.

9.3. The Supplier ensures the implementation of emergency response 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. These measures should include implementation procedures and, at a minimum, continuity and recovery plans in the event of adverse weather conditions or other natural disasters, lack of manpower or other resources, downtime or unavailability of the system and / or facilities, power outages and communication outages.

9.4. The Provider notifies the Public of any data security vulnerabilities and immediately fixes them.


10. Corporate ethics

10.1. The Supplier undertakes to act in accordance with national and international competition laws and not to engage in price collusion, market or customer allocation, market sharing, or collusion with competitors when bidding.

10.2. The Supplier undertakes not to contribute, directly or indirectly, to 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 be familiar with and comply with the trade restrictions that apply to its activities, including information about the countries and organizations that are subject to sanctions.

10.4. The Supplier must operate in accordance with the principles of responsibility and integrity. The supplier must use internal control systems to detect and prevent fraud and money laundering and respond to such cases. All cases of potential fraud that may affect the Company's operations should be reported immediately.

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11. Final provisions

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

11.2. The Company's Supplier hereby undertakes to acquaint its employees with this Supplier Code.

11.3. The Supplier and/or its employees are required to inform the Company of any detected or suspected violation of the Supplier's Code. This will not be used against the Supplier and / or its employees if they act in good faith. If anyone receives information, or suspects or witnesses the commission of any actions that violate the Supplier's Code, the relevant information must be transmitted to the Company through the communication channels indicated on the site <https://qazaqgaz.kz://qazaqgaz.kz>.

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

Full name: _____

Name: _____

Date: _____

Signature: _____

Print: _____

Introduction sheet

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