

Edition: No. 1 Policy against discrimination and harassment in Id. code: P-19-23 JSC "NC "QazaqGaz" and its subsidiaries and affiliates

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

POLICY AGAINST DISCRIMINATION AND HARASSMENT IN JSC «NC «QAZAQGAZ» AND ITS SUBSIDIARIES AND AFFAIRS

Instance



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Foreword

Introduction: first time.

Edition: No. 1

Id. code: P-19-23

Revision date: 2028 year.



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1. Purpose and scope

- 1.1. This Policy against discrimination and harassment in JSC «NC «QazaqGaz» (hereinafter Company) and its subsidiaries and affiliates (hereinafter SAA, or collectively referred to as the Group of Companies) maintains a working atmosphere of respect and dignity in the Company.
- 1.2. Each employee of the Company and the Group of Companies has the right to work in a professional atmosphere that promotes equal career opportunities and excludes illegal discriminatory practices, including harassment. In this regard, the Society expects that all relationships between people in the Society will be business-like and free from discrimination, prejudice and persecution.
- 1.3. The purpose of this Policy is to spread intolerance against discrimination and harassment among all employees of the Company and the Group of Companies, as well as to create and maintain measures to prevent, respond to and prevent discrimination and harassment.
- 1.4. The objectives of this Policy are to ensure that employees are made aware of the non-discrimination and harassment, the consequences, create conditions for the safe and confidential provision of protection against discrimination and harassment, and establish a standard process for ensuring due process is followed when investigating allegations of discrimination and harassment, ensuring protecting the rights of those involved in such cases, including victims, witnesses and alleged perpetrators.
- 1.5. The Company seeks to provide a favorable environment for its employees in respect of human rights, in accordance with the legislation of the Republic of Kazakhstan, as well as the UN Guiding Principles on Business in the Aspect of Human Rights (2011), the Convention on Discrimination in Employment and Employment (1958), the Declaration International Labor Organization on Fundamental Principles and Rights at Work (1998).

2. Regulatory references

The Policy uses links to the following regulatory documents:

- Declaration of the International Labor Organization on Fundamental Principles and Rights at Work;
- the Convention on Discrimination in Labor and Employment;
- 2011 UN Guiding Principles on Business and Human Rights;

Code of Business Ethics of JSC «NC «QazaqGaz»;

- DP-01 General requirements for the development, execution and presentation of internal regulatory documents of JSC «NC «QazaqGaz»;
- DP-02 Documentation management;
- DP-03 Records management

3. Terms and Definitions

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

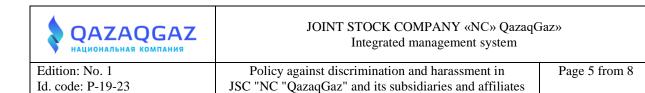


Table 1. Terms and definitions

Terms	Definitions					
Discrimination	Violation of the equality of citizens, which means a direct or indirect restriction of the rights and freedoms of a person (citizen) based on origin, social, official or property status, gender, race, nationality, language, attitude to religion, beliefs, place of residence, membership in public associations or for any other circumstances.					
Harassment	Human behavior that causes inconvenience or even harm to another person, violating his privacy.					
Management	Chairman of the Management Board (General Director), Deputy Chairmen of the Management Board (General Director), Members of the Management Board					
Law / Legislation	Current legislation of the Republic of Kazakhstan					

4. Abbreviations and symbols

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

Table 2. Abbreviations and symbols

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

5. Responsibility and authority

- 5.1. The Board of Directors and the Management Board of the Company are responsible for providing all necessary resources for the implementation of this Policy.
 - 5.2. Management assumes responsibility for the implementation of this Policy.
- 5.3. Managers and employees of the Group of Companies are responsible for the unconditional full fulfillment of their duties to prevent discrimination and harassment in the workplace.
- 5.4. The obligations of the Company expressed in this Policy apply to the Company, employees, contractors and are included in the system of business relations of the Company with partners.
- 5.5. Responsibility for the development of this Policy in accordance with the requirements of the documented procedure DP-01 «General requirements for the content, presentation and execution of the Company's internal regulatory documents» is borne by the DMHRaLP.
- 5.6. The responsibility for the management of this Policy in accordance with the requirements of the documented procedure DP-02 «Document Management» lies with the RSU IMS.



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

6.1. The policy is based on the following principles:

Equal Employment Opportunity: everyone has equal opportunities in exercising their rights and freedoms in the sphere of work. No one can be limited in their rights in the sphere of labor, except in cases and in the manner provided for by the Labor Code of the Republic of Kazakhstan and other laws of the Republic of Kazakhstan.

Sexual harassment in the workplace: Sexual harassment includes unwanted sexual behavior such as physical contact and sexually suggestive suggestions, remarks, pornography and sexual demands, whether in word or action, and is illegal under the laws of the Republic of Kazakhstan.

Each employee of the Company and the Group of Companies in their official relations with colleagues must take measures aimed at creating a favorable moral and psychological atmosphere that excludes any form of discrimination and encroachment on the honor and dignity of colleagues.

Persecution: It is strictly forbidden to persecute on the basis of other qualities that are the object of protection in accordance with the legislation of the Republic of Kazakhstan. For the purposes of this policy, harassment is defined as verbal, written, or physical acts that have the intent or effect of creating an intimidating, hostile, or offensive workplace environment.

Psychological abuse: with creating an intimidating, hostile, intolerable, or offensive work environment through employee-obnoxious or objectionable conversations, suggestions, requests, demands, physical contact, or attention, offensive, or otherwise inappropriate content.

Demonstration or discussion any written or graphic materials, including calendars, posters, that contain offensive connotations or demonstrate hostility towards an individual or group of people because of gender, as well as unwanted display or public display of offensive images, audio and video materials.

Harassment in cyberspace: receiving unsolicited, offensive e-mails or explicit text messages; inappropriate, offensive claims in social networks or online chats.

- 6.2. Each employee of the Company may notify the immediate supervisor, representatives of structural units for ensuring corporate security, human resource management, or apply to the relevant authorized bodies of the Republic of Kazakhstan.
- 6.3. Discrimination and harassment are unacceptable and prohibited behaviors for all employees.

7. Recordings

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

8. Revision, modification, storage and distribution

- 8.1. The Policy is reviewed as necessary, but at least once every three years by the Management Board of the Company for its relevance and compliance with applicable standards and practices.
- 8.2. Revision, modification, storage and distribution of this Policy are carried out in accordance with the requirements of the documented procedure DP-02 «Documentation Management».
- 8.3. The «original" in paper form of this documented procedure is drawn up and stored in the Company's RSU IMS.
- 8.4. A scanned version of this documented procedure is posted on the Company's Internet portal.



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Change Registration Sheet

Change	Number	Total	Section	Description of	Change note		
number	of pages	pages in Document	numbers to which the changes apply	changes	Full name	Signature	date



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Reference Sheet

No. p/n	FULL NAME	Job title	Signature	Date