

Key provisions of the Code of Conduct (Business Ethics Code) of KEGOC



- ▶ **Our values**
- ▶ **Sustainable development**
- ▶ **Ethical behaviour**
- ▶ **External communications and social networks**
- ▶ **Equal conditions of hiring and work**
- ▶ **Prohibition of discrimination and harassment**
- ▶ **Engagement of third parties**
- ▶ **Anti-corruption**
- ▶ **Conflict of interest**
- ▶ **Gifts and hospitality**
- ▶ **Protect the Company's assets**
- ▶ **Correctness of completion of the financial statements**
- ▶ **Information Management**
- ▶ **Compliance**



Fairness and honesty

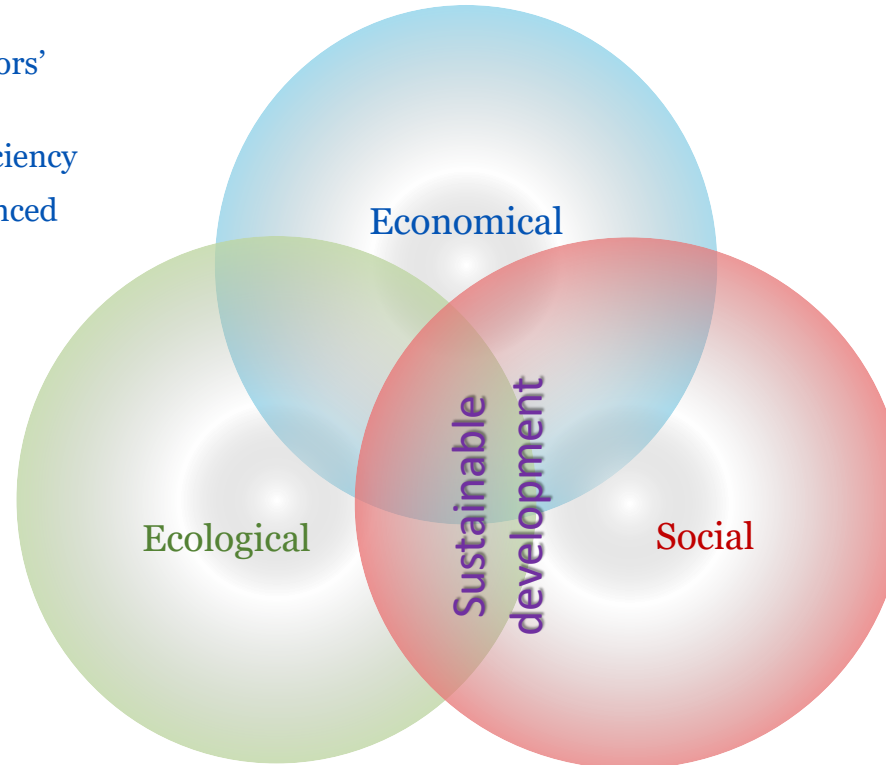
Challenge and development

Unity and responsibility

Traditions and respect

KEGOC cares about the future generation and pays special attention to the sustainable development of our country.

- ✓ Growth of the long-term value
 - ✓ Protection of shareholders' and investors' interests
 - ✓ Enhancement of business process efficiency
 - ✓ Growth of investment in R&D of advanced technologies
 - ✓ Enhancement of labour efficiency
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- ✓ Minimal environmental impact
 - ✓ Optimal use of limited resources
 - ✓ Use of environmentally friendly, energy- and material-saving technologies
 - ✓ Minimal waste and use of waste management



- ✓ Ensuring labour health and safety
- ✓ Fair remuneration and respect for the rights of workers
- ✓ Individual personnel development
- ✓ Implementation of social programmes for the personnel
- ✓ Creation of new jobs
- ✓ Participation in environmental and educational activities

**Please pay attention to:
Signs of any obvious or potential violations of the laws of the Republic of Kazakhstan, including the environment laws.**

We are the employees of the Company, and our actions may affect the Company's reputation.

Your responsibilities are:

- To comply with generally accepted moral and ethical standards of conduct; show respect for the state and other languages, traditions and customs of all countries, when representing the interests of KEGOC;
- To comply with general moral and ethical standards of conduct including in work-off hours, to prevent antisocial behaviour that could damage the Company's reputation;
- To refrain from making public statements on the Company's performance, if you do not have the proper authority.



**Please pay attention to:
to any unethical behaviour of employees which could lead to the loss of
the Company's reputation.**

You should always remember that you are the face of the Company even outside KEGOC's premises.

Your responsibilities are:

- Not to make any public statements or addressing anywhere on behalf of KEGOC, unless you have the authority to do so;
- Not to use your official position for personal gain;
- Not to express personal opinion about KEGOC's operations in mass media;
- To refrain from publishing in social networks, blogs and forums from harsh statements of any colour on issues: politics, nationality, sexual orientation, religion.



**Please pay attention to:
Any unofficial activity on social networks directly related to KEGOC.**

The Company has established a fair recruitment process and promotion aimed at forming a team of professionals with diverse experience and talents.

Your responsibilities are:

- To perform your duties professionally based on our corporate values and principles, adhering to the highest ethical standards;
- To take every decision on hiring, remuneration and promotion with due account of the merits, qualifications, effectiveness and production need;
- To exclude any possibility of nepotism, subjectivity or prejudice.



Please pay attention to:

- **Any signs of any obscene or inappropriate behaviour at work.**
- **Any signs of obvious or potential violations of the labour laws of the Republic of Kazakhstan.**

Our Company does not tolerate any form of discrimination, including discrimination on religious, racial, ethnic, gender, age or other grounds.

Your responsibilities are:

- To treat your colleagues respectful and fairly;
- Not to intimidate or insult your colleagues;
- Not to make inappropriate comments about your colleagues.



Please pay attention to:

- **Any signs of any obscene or inappropriate behaviour at work.**
- **Any signs of any potential violations of the Constitution of the Republic of Kazakhstan.**

Our Company works with suppliers, consultants, business partners and other third parties based on the principles of openness, full commitment to the law, honesty and efficiency.

Your responsibilities are:

- To choose suppliers only based on their qualifications, merit and the competitiveness in strict accordance with the Laws of the Republic of Kazakhstan.
- Not to cooperate with third parties with doubtful business reputation;
- To make every effort to create a competitive environment;
- To make sure that our third parties are aware of regulations of the Business Ethics Code;
- To make sure that the payment paid complies with goods/services provided;
- To be respectful and fairly to the third parties.



Please pay attention to:

- **If third parties are involved or accused of unreliable business practices;**
- **If third parties insist on receiving a commission or remuneration before concluding a contract with us.**

KEGOC is an ardent opponent of all forms of corruption and bribery.

Your responsibilities are:

- In any circumstances, not to offer, accept, ask or give bribes, do not make illegal payments to officials for expediting procedures, simplifying formalities or assisting in their execution, do not offer any benefits in monetary or non-monetary terms for a positive outcome of transactions ;
- Not to use political and charitable payments as a bribe;
- Before offering any gift or sign of attention to a public officer on the occasion of any activity or event, to coordinate this with the Compliance Officer in advance;
- To report any concerns regarding inappropriate payments to your direct manager and Compliance Officer.



Please pay attention to:

- **If the receipt of a public service is delayed for an unknown reason and the public officer assures that he/she can help in accelerating.**

Our Company encourages everyone to avoid situations, when your personal interests or relationships potentially influence or may influence your business decisions for KEGOC.

Your responsibilities are:

- To avoid situations where your personal relationships/circumstances influence your business decisions at KEGOC;
- To disclose information about your actual, potential or identified conflicts of interest to your immediate supervisor or Compliance Officer;
- Not to participate in decision-making, if you have an actual, potential or identified conflict of interest;
- Not to participate in any work and business (commercial or non-commercial) outside the Company, if it has a negative effect on your activity in the Company;
- To seek advice and recommendations from your direct manager or Compliance Officer if you have any doubts as to whether your personal circumstances affect your job responsibilities at KEGOC



Please pay attention to:

- **If you or your colleagues have family members or other affiliates who work for KEGOC or for an organization that is a potential or actual partner or supplier of KEGOC.**
- **If you or your colleagues have a shareholding in the organization or occupy a management position in this organization, which is a potential or actual partner, or supplier of KEGOC;**
- **If you or your colleagues have part-time work or other activities outside the Company that may require you or your colleagues to use KEGOC resources, including confidential information.**

KEGOC's Anti-Fraud and Corruption Policy prohibits



prohibited

Receive material reward, gifts or favours for acts (or omissions) for the benefit of those who have provided them



prohibited

Giving gifts, material rewards and hospitality in order to obtain an advantage for yourself or Samruk-Kazyna, where such actions could be perceived as a bribe



prohibited

Pay or accept payments as facilitation payments, i.e. for completing or expediting normal procedures

If you are aware of any violations, please contact the hotline;
Call 8 000 080 4747, (calls within the Republic of Kazakhstan are free); or
to email@sk-hotline.kz; or

via the Internet portal www.sk-hotline.kz; or
via WhatsApp messenger with the number +7 771 191 8816.

If you have any questions, please contact
the Compliance Officer (amirov.a@kegoc.kz).

Each of us should introduce the practice of proper attitude and high responsibility in order to achieve asset growth and add its value.

Your responsibilities are:

- To keep KEGOC property safe as if it were your personal property;
- To take responsibility for overseeing the proper use of KEGOC assets;
- To maintain accurate documentation and authorization process for the use of assets;
- To ensure only proper use of assets in accordance with your responsibilities.



Please pay attention to:

- **Any appropriation or embezzlement of assets;**
- **Incorrect protection of assets from stealing and damage;**
- **Any signs of fraud, damage or stealing.**

Correctness of completion of financial reports and accounting documents and their transparency

Our company provides accurate and complete financial and business information.

Your responsibilities are:

- To obtain approval for a transaction from a person with the necessary level of authority;
- To properly register transactions and contracts;
- To keep complete, accurate and timely records of all business operations;
- Not to use hidden records and illegal financial transactions.



Please pay attention to:

- **Incorrect and incomplete reports with overestimated financial forecasts and incorrect indicators of expenses;**
- **For signs of dishonest activity, for example, the use of de facto funds for other purposes not designated de jure;**
- **Incomplete and inaccurate travel and other expenses;**
- **The inconsistency of production activities with financial results.**

Our Company considers information as a KEGOC asset, part of which is confidential. Confidential information should never be disclosed to third parties without permission.

Your responsibilities are:

- To share confidential information outside the Company strictly as necessary and only after receiving a recommendation from the Security Service and/or Compliance Officer;
- To comply with all internal requirements and restrictions regarding the disclosure of confidential information;
- To take measures to protect confidential information if you find out about any leak;
- To sign a confidentiality non-disclosure obligation;
- To make sure that third parties have signed a confidentiality agreement before you disclose confidential information to them.



Please pay attention to:

- **Discussion of confidential information with third parties in public places is unacceptable;**
- **The appearance of any confidential information in the media.**

Compliance with the Business Ethics Code is fully supported by the Board of Directors.

Your responsibilities are:

- To comply with the Laws of the Republic of Kazakhstan and other legal acts related to the Company;
- To comply with all internal regulatory documents of the Company;
- To apply for an indication and/or clarification of internal normative documents or laws of the Republic of Kazakhstan and other legal acts to the Legal Department and/or Compliance Officer, if you have doubts about the interpretation, if there are contradictions between various legal acts and/or internal normative documents, if your personal obligations contradict the obligations to the Company.



Please pay attention to:

- **Any unlawful act committed by your colleagues or management;**
- **A violation or non-compliance with the regulations of the Business Ethics Code and/or other internal normative documents in favour of their own interests.**

On 25 September 2021 the Board of Directors of the Company appointed **Askar AMIROV the Compliance officer of KEGOC JSC.**

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E-mail: amirov.a@kegoc.kz

Postal address: 59 Tauyelsizdik Ave., 010010, Nur-Sultan, attn: Compliance Officer of KEGOC JSC

If you are aware of the facts of violations, please contact the hotline:

by phone: 8-800-080-4747. (the call in Kazakhstan is free); or

· by e-mail: mail@sk-hotline.kz; or

· through the Internet portal: www.sk-hotline.kz or

via WhatsApp: 8-771-191-88-16

The hotline is available 24/7. The phone calls are accepted by the operator from 09.00 to 18.00 from Monday to Friday. At other times (including holidays / weekends) the telephone calls are received by an answering machine with a recording option. After-hours calls are processed on the first working day they are received.