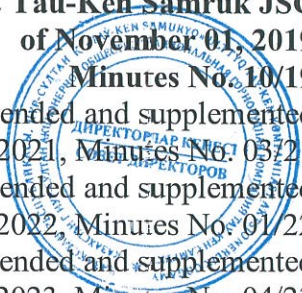


**Approved by the decision of the  
Board of Directors of  
NMC Tau-Ken Samruk JSC  
of November 01, 2019  
Minutes No. 10/19**  
as amended and supplemented  
of April 07, 2021, Minutes No. 03/21  
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as amended and supplemented  
of March 30, 2023, Minutes No. 04/23



**Anti-Corruption Policy in  
Joint Stock Company “National Mining Company “Tau-Ken  
Samruk” and its Subsidiaries**

**Nur-Sultan, 2019**

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## 1. Terms, definitions and abbreviations

<b>Stock company</b>	Joint Stock Company “National Mining Company “Tau-Ken Samruk”
<b>Policy</b>	Anti-Corruption Policy of NMC Tau-Ken Samruk JSC and its subsidiaries
<b>Corruption</b>	Illegal use by officials of their official (office) authorities and related capabilities to obtain or gain personally, or through intermediaries, property (non-property) benefits and advantages for themselves or third parties, as well as bribery of these persons by granting benefits and advantages
<b>Corruption offense</b>	Act (action or omission) that has signs of corruption, for which the legislation of the Republic of Kazakhstan establishes administrative, criminal, civil or disciplinary liability.
<b>Corruption risks</b>	The risk of committing corruption offenses.
<b>Employees of the Company</b>	Individuals who have labor relations with the Company on the basis of an employment contract.
<b>Bribe</b>	Receiving by an official, a foreign official or an official of a public international organization personally or through an intermediary of a bribe in the form of money, securities, other property or in the form of illegal rendering of property-related services to him/her, granting other property rights (including when a bribe is transferred to another individual or legal entity on the instructions of an official) for committing actions (inaction) in favor of the bribe-giver or persons represented by him/her, if these actions (inaction) are included in the official authorities of an official or if, by virtue of his/her official position, he/she can contribute to these actions (inaction), as well as for general patronage or connivance in the service.
<b>Anti-corruption</b>	The activities of the Company and its Subsidiaries, Management Bodies of the Company within their authorities to prevent corruption, including

identification and further elimination of the corruption reasons (corruption preventing); to minimise and/or eliminate consequences of corruption offenses.

**Conflict of Interests** This is a situation where a trusted employee has a competing professional or personal interest. The presence of such competing interests may prevent the employee from performing their liabilities impartially.

**Anti-corruption legislation** The Law “On Combating Corruption” of the Republic of Kazakhstan, regulatory acts, the main requirements of which are the prohibition of bribery, the prohibition of receiving bribes, the prohibition of commercial bribery, the prohibition of mediation in bribery, as well as other legal acts on combating corruption.

**Board of Directors** Management body of NMC Tau-Ken Samruk JSC

**Management Board** The executive body of NMC Tau-Ken Samruk JSC

**Subsidiaries** Subsidiaries

Definitions used, but not disclosed in this Policy, comply with the definitions used in the legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Company.

## 2. General Provisions

1. This Policy of the Company is an internal regulatory document defining the key principles and requirements aimed at combating corruption and minimizing corruption risk, as well as ensuring compliance by the Company, its management bodies, employees, employees and other persons entitled to act on behalf of and in the interests of the Company, with the applicable anti-corruption legislation.

2. The Policy was developed in accordance with the legislation of the Republic of Kazakhstan, the Charter of the Company and its subsidiaries, as well as other internal documents of the Company.

3. Provisions of this Policy apply to all employees of the Company, regardless of their position, status and duration of their work in the Company, Subsidiaries to, as well as to persons acting on behalf of the Company. All employees of the Company and its Subsidiaries must be guided by this Policy and strictly comply with its principles and requirements.

4. The Company declares its rejection of corruption and intolerance of corrupt behavior in any forms and manifestations, monitors compliance with the principles

and requirements of the Policy by members of the management bodies, employees of the Company and Subsidiaries.

### **3. Goals and objectives of the Policy**

5. The anti-corruption goal in the Company and Subsidiaries is to develop and implement measures to prevent, eliminate (minimize) the causes and conditions that generate corruption, to form an anti-corruption consciousness characterized by intolerance of employees and management to corruption manifestations.

6. The main goals and objectives of this Policy include:

1) generalization and explanation of the main requirements of the anti-corruption legislation of the Republic of Kazakhstan, which can be applied to the Company, employees of the Company and Subsidiaries;

2) ensuring compliance of the Company's activities with requirements of the anti-corruption legislation of the Republic of Kazakhstan, standards of business ethics;

3) regulation of the activities of the Company and Subsidiaries in the field of anti-corruption, formation at the members of the management body, employees of the Company and Subsidiaries, clients and counterparties of an unambiguous understanding of the Company's position on rejection of corruption and intolerance of corrupt behavior in any forms and manifestations in the implementation of the activities of the Company and Subsidiaries;

4) establishment of adequate procedures for the prevention of corruption in the Company and Subsidiaries to mandatory for execution;

5) minimization of the risk of involvement of the Company, members of management bodies, employees of the Company and its Subsidiaries in corruption offenses;

6) establishing the obligation of members of the management bodies and employees of the Company, Subsidiaries and dependent organizations of the Company, agents, partners, as well as other persons related/or will be related to the Company to know and comply with the anti-corruption legislation of the Republic of Kazakhstan.

### **4. Anti-corruption principles**

7. The basic anti-corruption principles in the Company and Subsidiaries are:

1) "zero tolerance for any corruption" - the Company and Subsidiaries adhere to the principle of complete rejection of corruption in any form and manifestation in its activities. This principle means a strict prohibition for officials and employees of the Company and Subsidiaries as well as other persons acting on behalf of the Company or in its interests, directly or indirectly, personally or through any intermediary, participate in corruption acts, regardless of business practices in one or to another country;

2) commitment of the top management and establishment of the "tone from the top" - the Board of Directors of the Company plays a key role in fostering 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 should declare their uncompromising attitude to any forms of corruption, demonstrate, observe and implement this principle through personal example;

3) employee involvement - the Company informs its officials, employees of the Company and Subsidiaries about the provisions of anti-corruption legislation of the Republic of Kazakhstan and welcomes their active participation in the formation and implementation of anti-corruption standards and procedures;

4) inevitability of punishment - the Company declares the inevitability of punishment for employees of the Company and Subsidiaries regardless of the position held, length of service and other conditions if they commit corruption offenses in fulfilling their official duties;

5) legality and compliance of this Policy with the legislation of the Republic of Kazakhstan and international legislation - the Company and Subsidiaries strictly observe the anti-corruption legislation of the Republic of Kazakhstan and other countries in which it plans to operate / operates;

6) effectiveness of anti-corruption procedures - the Company and Subsidiaries strive to make the procedures as transparent, clear, and feasible as possible, which ensure the ease of their implementation and obtaining a meaningful result. The Company evaluates the effectiveness of existing control procedures and improves them in case of inefficiency;

7) interaction and coordination - the Company and Subsidiaries ensure interaction and cooperation in the field of anti-corruption activities with public authorities, partners, clients and counterparties of the Company and Subsidiaries;

8) taking organizational measures aimed at identifying conflicts of interest and managing conflicts of interest;

9) taking comprehensive measures to counteract the legalization (laundering) of proceeds from crime, including as a result of corrupt actions;

10) publicity and openness of activities, including posting of all necessary documents within the framework of the activities of the Company and Subsidiaries on the official websites of the Company and Subsidiaries, respectively.

## **5. Scope of the Policy**

8. The principles and requirements of the Policy are taken into account when the Company and Subsidiaries establish contractual and other business relations with individuals and legal entities.

9. The Company publishes this Policy on the official website of the Company [www.tks.kz](http://www.tks.kz) and hereby confirms its rejection of corruption in all its forms and manifestations.

10. The Compliance Officer of the Company monitors compliance with the anti-corruption legislation of the Republic of Kazakhstan in the Company, its Subsidiaries and dependent organizations.

11. The Company, members of management bodies, employees of the Company and its Subsidiaries are prohibited from engaging or using intermediaries, partners, agents or other persons to commit any actions that contradict the principles and requirements of this Policy or the norms of applicable anti-corruption legislation.

12. Employees of the Company, Subsidiaries and members of the management bodies of the Company must:

1) be guided by the Policy and strictly comply with its principles and requirements;

2) refrain from committing and (or) participating in committing corruption offenses in the interests or on behalf of the Company/Subsidiary;

3) immediately inform the direct manager, the CEO, the Compliance Officer and (or) the Management Board of the Company about cases of inducement of an employee of the Company or Subsidiary to commit corruption offenses, about information that has become known to the employee about cases of corruption offenses by other employees, choosing any of the methods of applying according to the Proactive Informing Policy of the Company;

4) inform the direct manager or an authorized official about the possibility of a conflict of interest that has arisen, one of the parties to which is the employee.

13. If there are doubts about the correctness of their actions or other standards of conduct, officials and employees of the Company, Subsidiaries may contact the Compliance Officer of the Company in order to obtain an appropriate explanation.

## **6. Corruption activities. Anti-corruption activities management**

14. Corruption offenses (actions or omissions) are not permitted:

1) in any form, including in the form of receiving or providing funds, valuables, services or other benefits;

2) in relation to the Company or Subsidiaries or on behalf of and in the interests of the Company or Subsidiaries, in relation to third parties, including in relation to state and regulatory bodies and their employees, other legal entities and their employees, management bodies and representatives of these legal entities;

3) personally or through the mediation of third parties, regardless of the purpose, including the simplification of administrative and other procedures, and the provision of any benefits.

15. Members of the management bodies, employees of the Company and its Subsidiaries are strictly prohibited from committing corruption offenses directly or indirectly, personally or through the mediation of third parties, including to simplify administrative and other formalities.

16. Members of the management bodies, employees of the Company and Subsidiaries when performing their official duties must comply with the anti-corruption legislation of the Republic of Kazakhstan, the national legislation on combating corruption of foreign states (when the Company or Subsidiaries perform activities on the territory of foreign states), the norms and requirements of international anti-corruption legislation.

17. The Company and Subsidiaries prevent corruption by:

1) forming a personal position of rejection of corruption and intolerance of corrupt behavior in any forms and manifestations among employees of the Company and Subsidiaries, informs them about the basic principles of the Policy, responsibility for its violation and requires employees of the Company and Subsidiaries to comply with the Policy;

2) maintaining reliable financial (accounting) statements of the Company and Subsidiaries, preventing intentional distortion or falsification of statements and the use of forged documents. Employees whose competence includes accounting are responsible for the preparation and providing of complete and reliable reporting;

3) conducting an external audit of financial and economic activities on a regular basis, monitoring compliance with requirements of the current legislation of the Republic of Kazakhstan and internal regulatory documents of the Company and Subsidiaries, including the principles and requirements established by this Policy;

4) prevention and settlement of a conflict of interests;

5) introduction of special procedures for verifying counterparties in order to reduce the risk of involvement of the Company and Subsidiaries in corrupt activities and other unfair practices in the course of relations with counterparties (collection and analysis of publicly available information about potential counterparties: their reputation in business community, duration of activity in the market, participation in corruption scandals, etc.), inclusion in contracts concluded with counterparties, provisions on compliance with anti-corruption standards (anti-corruption clause).

18. Members of the management bodies of the Company and Subsidiaries set an example of rejection of corruption, intolerance to corrupt behavior in any forms and manifestations at all levels.

19. The Company, its employees and employees of Subsidiaries are prohibited from using any form of incentives, including in the form of cash, valuables, services or other benefits, in favor of any persons and organizations to influence the actions (inaction) of any officials in order to simplify, accelerate or overcome bureaucratic, administrative and other formalities.

20. The Company will take all necessary measures to conduct an internal audit or investigation of all identified signs of bribery, corruption and abuse of their official position by employees of the Company or Subsidiaries.

21. The Compliance Officer monitors the functioning of procedures in the Company, Subsidiaries, aimed at minimizing the risks of corruption specific to activities of the Company and Subsidiaries:

1) initiates updating of the internal documents of the Company and Subsidiaries in relation to amendments to the anti-corruption legislation;

2) carries out regular updating and assessment of corruption risks;

3) accepts and considers reports from employees of the Company and Subsidiaries on violations of this Policy, on suspicion of committing a corruption offense, based on the results of which, if necessary, initiates an internal audit or an internal investigation;

4) conducts internal audits and internal investigations on the facts of third-party appeals on issues of extortion, bias in service, giving preference to one client



over others and other factors of possible illegal actions of corruption nature of employees of the Company and Subsidiaries;

5) performs other functions assigned to its competence by this Policy, other internal regulatory documents of the Company.

22. The direct managers of employees of the Company and Subsidiaries exercise control over compliance by employees of the Company and Subsidiaries with provisions of this Policy. The direct managers ensure that the Compliance Officer of the Company is immediately informed of the revealed facts of violation of this Policy.

## **7. Set of measures on preventing and combating corruption**

23. In some areas of activities of the Company and Subsidiaries the possible occurrence of corruption risk, such areas include, but are not limited to the above:

- 1) Involvement of third parties and making payments to third parties;
- 2) Gifts and representation expenses;
- 3) Sponsorship and charity;
- 4) Making transactions within the framework of investment activities of the Company for the acquisition and disposal of assets, mergers and amalgamation and other transactions;
- 5) personnel management.

### **7.1. Involvement of third parties and making payments to third parties**

24. The Company and Subsidiaries refrain from engaging third parties and from participating in joint ventures with partners that violate the principles and requirements of the anti-corruption legislation of the Republic of Kazakhstan or create a risk of loss of business reputation for the Company and Subsidiaries.

25. Before deciding to start or continue business cooperation with third parties or participate in a joint venture, the relevant structural subdivisions of the Company and Subsidiaries initiating the involvement of third parties are obliged to:

1) Comply with the procedures established by the Procurement Rules for Goods, Works and Services by Samruk-Kazyna JSC and Organizations at Least Fifty Percent of Voting Shares (Equity Interest) of which are Directly or Indirectly Owned by the Fund on the Right of Property or Trust Management;

2) Monitor actions of third parties and joint venture partners to any manifestations of corruption by carrying out the following procedures (including, but not limited to):

2.1) Verifying the availability of their own anti-corruption policies and procedures, readiness to comply with requirements of this Policy and to carry out mutual cooperation in the field of anti-corruption;

2.2) Verifying business reputation and absence of a conflict of interests;

2.3) Verifying for pseudo-entrepreneurship, reliability, the presence of tax and other debts, the source of funds.

3) Inclusion of an anti-corruption clause in the concluded transactions.

26. The Company and Subsidiaries welcome the adoption by third parties and joint venture partners of anti-corruption policies and procedures, as well as standards of conduct.

## **7.2. Giving, accepting gifts, other services (token of appreciation)**

27. In accordance with the legislation of the Republic of Kazakhstan, it is prohibited for officials and employees of the Company and its Subsidiaries, as well as family members of these persons to receive material remuneration, gifts or services provided for the actions (inaction) of this person in favor of persons who provided material remuneration, gifts or services if such actions (inaction) refer to the official authorities of this person, or, by virtue of his/her official position, he/she can contribute to such actions (inaction).

28. Gifts and money received without the knowledge of persons performing managerial functions and (or) members of their families are subject to gratuitous transfer/payment to the authorized state body in accordance with the requirements of anti-corruption legislation.

29. The Company recognizes the exchange of business gifts during official meetings and exercising of representative expenses, including business hospitality, as a necessary part of doing business and generally accepted business practice. The Company encourages in all respects an atmosphere of honesty and transparency regarding business gifts and hospitality expenses.

30. Exercising of representative expenses, including for business hospitality of the Company and its Subsidiaries with third parties, should meet the following criteria:

1) fully comply with the standards of the current legislation of the Republic of Kazakhstan, the Code of Conduct, and internal regulations of the Fund;

2) be reasonably grounded, proportionate, and not luxury goods;

3) not represent a hidden remuneration for a service, action, inaction, connivance, wardship, granting rights, taking a certain decision on a transaction, agreement, license, permission, etc., or an attempt to influence the recipient for another illegal or unethical purpose;

4) exercising hospitality is not intended and cannot be perceived as intended to impact on or induce a person to act in a certain way, or to reward that person for performing his/her role or function;

5) not create a reputational risk for the Fund, officials and employees of the Fund and other persons in the event of disclosure of information about gifts or representative expenses;

6) exercising of hospitality is appropriate and within the scope of this Policy and does not violate the relevant hospitality policy of the third party.

31. Any exercising of hospitality should be carried out in accordance with the legislation of the Republic of Kazakhstan and the internal regulations of the Company and its Subsidiaries.

32. Offering of hospitality and gifts to the government officials, persons

performing functions of management in quasi-public sector entities and their families is not permitted. It is also not allowed to offer or give gifts if it is known that accepting the gift is unacceptable for the donee.

33. If in doubt as to the compliance of a business gift or event with the requirements of this Policy, an employee should consult on this issue with the direct manager or a Compliance Officer of the Company.

34. Employees and officials of the Company and its Subsidiaries avoid giving and/or accepting business gifts and hospitality as such actions will have an improper effect or create the appearance of such an impact on employees, officials, and business partners of the Company and its Subsidiaries.

35. When entering business relationships, employees are recommended to familiarize business partners with this Policy. If available, to familiarize yourself with a similar internal document adopted by business partners, third parties.

36. If such a gift in the form of cash or cash equivalents is received through imprudence, the employee should inform in writing the Head of his/her subdivision or (if the employee is the Head of the subdivision) to a Compliance Officer and return it immediately.

37. An employee should inform in writing the Head of his/her subdivision in case of accepting an act of hospitality from a third party due to imprudence:

1) treats (food expenses) in the normal course of business relations with third parties;

2) a ticket, invitations (in cooperation with a third party) to cultural events that seem appropriate and within the usual business courtesy.

38. A Compliance Officer may conduct a preliminary assessment (of gifts, representative expenses, hospitality, etc.) for compliance with the criteria specified in item 30 of the Policy, which will help excluding, inter alia, cases of accepting a hospitality from a third party inadvertently.

39. The actions specified in this section should be registered in the Gifts and Hospitality Register, which is maintained by a Compliance Officer of the Fund in accordance with Annex 2.

40. The Register is kept on paper, bounded, and numbered in order to exclude corrections, blots and erasures.

#### **7.2-1. Inviting a third party to a business conference, site visit, or similar business trip**

41. A third-party invitation to a business conference, site visit or similar business trip can be accepted only after agreement with the Head of the subdivision or his/her supervising manager (if the employee is the Head of the subdivision), if all the following requirements are met:

1) there is an immediate relevant business purpose (for all days of the business trip);

2) the minimum number of employees is sent on a business trip, and all are involved directly at work;

3) the receiving third party offers to pay only the minimum associated costs (e.g., admission ticket, food) and moderate representative expenses;

4) travel and accommodation should not exceed the limits established by the Company and its Subsidiaries;

5) flights/accommodation, if paid by the host third party, can be accepted only if their cost does not exceed the limits established by the Company and its Subsidiaries if the trip is carried out only for business purposes.

### **7.3. Sponsorship and charity**

42. The Company, being a subsidiary of Samruk-Kazyna JSC, carries out its activities to provide sponsor and charity support exclusively within the framework of internal regulatory documents of Samruk-Kazyna JSC concerning these issues.

43. The Company and its Subsidiaries do not prohibit the officials and employees from providing charity and/or sponsor support on their behalf.

### **7.4. Making transactions within the framework of investment activities of the Company**

44. When carrying out investment activities, the Company is guided by the Corporate Standard of Investment Activity of Samruk-Kazyna JSC and Legal Entities, more than Fifty Percent of Voting Shares (Interests) of which are Directly or Indirectly Owned by Samruk-Kazyna JSC, as well as the internal regulatory documents of the Company.

45. When planning transactions for the acquisition and alienation of assets, mergers and acquisitions, and anticipatory decision-making on the expediency of such transactions, the Company conducts a comprehensive audit of the facility's activities (due diligence), including verification of the reliability of the transaction in order to identify signs of corruption risk.

46. Regardless of the level of corruption risk in the acquired asset, after the relevant decision of the Company's management body on the implementation of the transaction, the Company will take measures to introduce anti-corruption policies, procedures and standards of conduct similar to those adopted in the Company in the acquired asset.

### **7.5. HR management**

47. The Company and its Subsidiaries adhere to the principles of objectivity and honesty when making personnel decisions. In order to eliminate corruption risks in the recruitment, evaluation, promotion and dismissal of the personnel, the Company and its Subsidiaries:

1) develop and approve, in accordance with the established procedure, transparent procedures for the selection and recruitment of personnel and the relevant qualification requirements for the position;

2) carry out an examination of candidates for employment before making a decision on the beginning or continuation of employment relations for their reliability and the absence of a conflict of interests;

3) evaluate the activities of the staff and pay remuneration based on the effectiveness of key performance indicators and professional achievements;

4) make a decision on promotion to a higher position based on the business qualities and qualifications of the employee;

5) carry out the procedure of termination of labor relations with an employee on the grounds provided for by the Labor Code of the Republic of Kazakhstan.

48. Officials, when hiring or continuing employment relations with the Company or its Subsidiaries, assume anti-corruption restrictions in the form of consent to adopt anti-corruption restrictions in accordance with Annex I hereto.

49. Failure to accept anti-corruption restrictions by the Company's officials and its Subsidiaries entails refusal to accept/transfer to a position.

## **7.6 Internal analysis of corruption risks**

49-1. Internal analysis of corruption risks refers to activities of the Company and its Subsidiaries to identify and study the causes and conditions that contribute to the commission of corruption offences.

Internal analysis of corruption risks is carried out in the following areas:

1) revealing corruption risks in internal regulatory documents affecting the activities of the structural unit;

2) revealing corruption risks in the organizational and managerial activities of the structural subdivision.

3) in the internal regulatory documents affecting the activities of the structural subdivision, discretionary powers and norms that contribute to the commission of corruption offences are identified.

Based on the results of the internal analysis of corruption risks, an analytical report is being prepared containing:

1) information on identified corruption risks;

2) recommendations for their elimination;

3) deadlines for the implementation of recommendations to eliminate identified corruption risks.

An analytical report with recommendations on the elimination of identified corruption risks is sent to the executive body of the Company and its Subsidiaries for consideration and adoption of appropriate response measures.

## **8. Prevention and settlement of a conflict of interests**

50. Conflict of interests management is one of the most important anti-corruption mechanisms. The Company and its Subsidiaries pay special attention to the prevention of risk realization associated with a conflict of interests, and their regulation.

51. Officials, employees of the Company and its Subsidiaries, when exercising their official authorities, are obliged to be guided by the interests of the Company and its Subsidiaries to avoid situations or circumstances in which their personal interests will contradict the interests of the Company or its Subsidiaries. In the event of a conflict of interests (or the possibility of its occurrence), officials, employees of the Company and its Subsidiaries are obliged to bring the information in writing to the attention of the direct manager or higher management of the Company.

52. The Chairman of the Board of Directors/the Chief Executive Officer of the Company, upon requests from officials or employees of the Company or its Subsidiaries, or upon receipt of information from other sources, are obliged to take appropriate response measures in a timely manner in accordance with the Company's internal regulatory documents.

## **9. Reports of corruption offences**

53. If there is any evidence of a fact or conditions in the Company or its Subsidiaries for a corruption offence to be committed by an official or employee of the Company or its Subsidiaries, this should be immediately reported to the Company's hotline, information about which is posted on the Company's corporate website, or to his/her direct or superior manager and (or) the Compliance Officer of the Company.

## **10. Internal inspection and investigation on signs of committing or creating conditions for committing corruption offences**

54. For all reports of signs of corruption offences in the Company and its Subsidiaries, an internal investigation is conducted with the participation of the relevant structural subdivisions of the Company and its Subsidiaries, respectively.

55. If, based on the results of an internal inspection or investigation, signs or facts of corruption are established, the completion of the inspection or investigation is considered to be the adoption of corrective measures based on the principle of zero tolerance for any corrupt practices, up to the termination of employment relations and the transfer of materials to the relevant authorized state bodies, as well as the improvement of control procedures.

## **11. Cooperation with law enforcement bodies**

56. The cooperation of the Company and its Subsidiaries with law enforcement bodies in countering corruption is one of the indicators of the genuine commitment of the Company and its Subsidiaries to the declared anti-corruption standards of conduct.

57. Cooperation in countering corruption can be carried out in the following forms:

- 1) sending materials to the relevant law enforcement bodies about signs or facts of corruption offences that the Company or a Subsidiary has become aware of;
- 2) providing assistance to authorized representatives of control and supervisory and law enforcement bodies when they conduct inspections of activities of the Company or its Subsidiaries on issues of prevention and countering corruption.

## **12. Responsibility**

58. All employees of the Company and its Subsidiaries, regardless of their position, are responsible for compliance with the principles and requirements of this Policy provided for by the current legislation and internal regulatory documents of the Company and its Subsidiaries, respectively, as well as for actions (inaction) of their subordinates that violate these principles and requirements.

58-1. The Heads of the structural subdivisions of the Company and its Subsidiaries in charge of business processes are responsible for:

- ensuring that compliance policy requirements are applied in the processes of supervised structural subdivisions;
- conducting a qualitative and timely analysis of compliance (including corruption) risks in supervised processes, as well as the development and execution of measures to mitigate them;
- timely response to incidents identified as indicators of corruption risks;
- continuous professional development of responsible employees by training them on various aspects of compliance and anti-corruption;
- timely notification of the Compliance Officer about the facts that have become known to them of violations of the requirements of compliance policies and legislation of the Republic of Kazakhstan by employees of the Company and its Subsidiaries, regardless of the subdivision and management level;
- committing corruption-related crimes by employees directly subordinated to them, if a connection is established between a corruption crime committed by a subordinate and the fault of the head in the non-performance or improper performance of official duties to prevent the commission of corruption-related offences.

Employees of the Company and its Subsidiaries shall be:

- obliged to comply with the requirements established by the Policy, internal regulatory documents of the Company and its Subsidiaries, as well as the legislation, or report the impossibility of their compliance to the direct manager;

- obliged to immediately inform the Compliance Officer or contact the hotline if they become aware of a committed or planned corruption offence;

- personally responsible for non-compliance with the requirements of the current legislation of the Republic of Kazakhstan.

59. Persons guilty of violating the requirements of anti-corruption legislation and the requirements of the Policy may be brought to disciplinary, administrative, civil or criminal liability in accordance with the procedure and on the grounds provided for by anti-corruption legislation, internal regulatory documents of the Company and its Subsidiaries.

59-1. The Chief Executive Officer of the Company is subject to disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan for non-performance or improper performance of official duties to prevent the commission of corruption offences by subordinate employees.

The Chief Executive Officer of the Company is subject to disciplinary responsibility for the commission of corruption crimes by employees directly subordinated to him under the following conditions:

1) a connection between a corruption crime committed by a subordinate and the guilt of non-fulfillment or improper performance of official duties to prevent the commission of corruption offences has been established;

2) upon a subordinate employee, there is a judicial act that has entered into legal force on bringing to criminal responsibility for a corruption crime, or a criminal case for committing a corruption crime has been terminated by a criminal prosecution body or a court on the basis of items 3), 4), 9), 10), 11) and 12) of part one of Article 35 or Article 36 of the Criminal Procedure Code of the Republic of Kazakhstan.

### **13. Final provisions**

60. The approval of present Policy, as well as the introduction of amendments and additions, refer to the competence of the Board of Directors of the Company.

61. If, as a result of changes in the legislation of the Republic of Kazakhstan, the Charters of the Company and its Subsidiaries to certain provisions of this Policy come into conflict with them, these Policy norms become invalid and until changes are made to the Policy, officials and employees of the Company and its Subsidiaries are guided by the current legal acts of the Republic of Kazakhstan.