

**Appendix 3**  
**to the Decision of the Board of Directors**  
**Kazakhtelecom JSC**  
**dated "22 "May 2023**  
**No. 24/93**

## **The Human Rights Policy**

## **1. General points**

1. The Human Rights Policy (hereinafter - the Policy) was approved by Kazakhtelecom JSC (hereinafter - Kazakhtelecom JSC) to demonstrate its commitment to respecting human rights in accordance with the requirements of the legislation of the Republic of Kazakhstan taking into account the best international standards.

2. The objectives of this Policy are to form a unified approach of Kazakhtelecom JSC to ensure protection of rights of employees, customers, suppliers, partners, shareholders and other interested parties somehow connected with Kazakhtelecom JSC's activity.

3. The Policy sets out the principles that guide Kazakhtelecom JSC to respect human rights at all stages of its operations.

4. The provisions of the Policy are voluntary commitments by Kazakhtelecom JSC.

5. The Policy is a publicly available document. Kazakhtelecom JSC employees, regardless of their position, shall comply with the requirements of the Policy.

6. Kazakhtelecom JSC expects its stakeholders, including suppliers and partners, to follow the principles set out in the Policy. Within the framework of contracting procedures, Kazakhtelecom JSC ensures that its suppliers and partners are informed of the Policy principles and ensures that they sign a statement of familiarity with the Policy.

7. Subsidiaries of Kazakhtelecom JSC are recommended to adopt their human rights policies based on the principles of this Policy.

8. This Policy should be read jointly with the Code of Business Ethics, Sustainable Development Policy, Equal Opportunity, Inclusion and Diversity Policy, and other internal documents of Kazakhtelecom JSC focused on protection and respect for human rights.

## **2. Key terms**

9. The following terms are used in this Policy:

1) discrimination – any distinction, exclusion or preference based on a person's distinctive characteristic which has the effect of eliminating or impairing equality of opportunity or treatment in employment, private life and occupation;

2) stakeholder – any entity or individual (or group thereof) that interacts with the Company in the course of its business and has direct or indirect influence and/or the ability to influence that business;

3) partners – suppliers, consultants and other persons who interact with the Company on the basis of a contractual relationship;

4) human rights – the inalienable rights of every human being, which are based on the recognition of the inherent dignity of the human person, as well as the freedom and equality of all human beings;

5) compulsory labor – all activities, work or services required of any person under threat of punishment or compulsion.

### **3. Application area**

10. The Policy applies to all Kazakhtelecom JSC's activities and stakeholder engagement.

### **4. Key principles**

11. JSC Kazakhtelecom complies with the legislation of the Republic of Kazakhstan, as well as international norms and regulations on human rights, including the Universal Declaration of Human Rights adopted by the UN General Assembly, the UN Global Compact and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

12. Kazakhtelecom JSC adheres to the belief that everyone is free and equal in dignity and rights, regardless of religion, gender, language, age, nationality, disability, marital status, social origin or other attributes and characteristics.

13. Kazakhtelecom JSC does not tolerate any form of discrimination and violation of human dignity, physical and psychological violence in the workplace.

14. Kazakhtelecom JSC opposes any action that promotes, encourages or incites other people or organisations to violate human rights.

15. Kazakhtelecom JSC is categorically against forced labor, child labor, human trafficking, including by partners and other stakeholders of Kazakhtelecom JSC.

16. Kazakhtelecom JSC guarantees the protection of human dignity and privacy.

17. Kazakhtelecom adheres to the principle of zero tolerance of corruption.

18. Kazakhtelecom JSC expresses its desire to develop human rights risk management procedures in line with best practices.

19. Kazakhtelecom JSC, exercising due diligence, seeks to identify and prevent any adverse human rights impacts in the course of its operations.

20. Kazakhtelecom JSC expresses its desire to develop and implement initiatives aimed at respecting human rights when interacting with third parties.

21. JSC Kazakhtelecom's relations with stakeholders are based on the principles of fairness and respect for human rights.

22. Kazakhtelecom JSC expresses its desire to improve corporate practices in support of human rights by maintaining an open dialogue with all stakeholders and introducing best practices.

## **5. Human rights commitments**

23. Kazakhtelecom JSC guarantees to its customers that there will be no discrimination or infringement of human dignity, including on the basis of religion, gender, language, age, nationality or disability.

24. Kazakhtelecom JSC ensures maximum possible security and confidentiality of customer data and personal information in accordance with the legislation of the Republic of Kazakhstan.

25. Kazakhtelecom JSC seeks to shape and implement industry-specific human rights programmes in line with best practices.

26. Kazakhtelecom JSC focuses on the principles of equality, diversity, inclusiveness and zero discrimination when building relations with employees.

27. Kazakhtelecom JSC guarantees that employees are not subject to discrimination or infringement of human dignity, including on the basis of religion, gender, language, age, nationality or disability.

28. Kazakhtelecom JSC respects the rights of all employees, including the right to freedom of expression and collective bargaining.

29. Kazakhtelecom JSC provides equal opportunities to all job applicants and employees in accordance with clearly defined hiring and rationing rules.

30. Kazakhtelecom JSC creates competitive, safe and favorable working conditions, protects the labour rights of all employees, including guarantees to all employees of decent wages and social security in accordance with the legislation of the Republic of Kazakhstan.

31. Kazakhtelecom JSC guarantees that its business partners are free from discrimination and infringement of human dignity, including gender, religion, language, age, nationality, race, disability.

32. Kazakhtelecom JSC does not tolerate discrimination and infringement of human dignity, any forms of forced labor, child labor, harassment and violence in the activities of its partners.

33. JSC Kazakhtelecom understands the importance of conducting human rights training for its employees, fostering a culture of engagement.

34. Kazakhtelecom JSC welcomes the existence of a publicly formulated corporate policy on human rights among its partners.

35. Kazakhtelecom JSC is focused on transparent, respectful and constructive cooperation with the society as a whole and the population of the

regions where Kazakhtelecom JSC is represented, as well as strives for long-term interaction with interested representatives of the society on human rights issues.

## **6. Policy enforcement**

36. Kazakhtelecom JSC carries out regular internal monitoring of its compliance with the principles of the Policy, as well as monitoring changes in the legislation of the Republic of Kazakhstan and international human rights standards.

37. Kazakhtelecom JSC introduces employees to the provisions and principles of the Policy.

38. Kazakhtelecom JSC maintains a dialogue with stakeholders and ensures that their views on human rights are taken into account.

39. Kazakhtelecom JSC provides employees and other stakeholders with the opportunity to freely report potential violations of the Policy and guarantees the confidentiality of communications.

40. Reporting of non-compliance with the policy takes place in one of the following ways:

1) by contacting the hotline (tel.: 8 800 080 47 47, 8 771 191 88 16, 8 701 941 10 01; website: <http://www.sk-hotline.kz/>; mail: [mail@sk-hotline.kz](mailto:mail@sk-hotline.kz));

2) by contacting the compliance service (tel.: 8 727 259 99 56, 8 800 080 26 62; mail: [tlek.issakov@telecom.kz](mailto:tlek.issakov@telecom.kz));

3) by contacting their line manager or the head of the division.

41. All appeals for breaches of the Policy should be received in a timely manner and dealt with objectively in accordance with internal procedures for dealing with appeals.

42. In the event of the emergence or detection of human rights violations, Kazakhtelecom JSC develops an action plan to eliminate the negative consequences and implements corrective measures to improve human rights practices within a short time frame.

43. Kazakhtelecom JSC guarantees that no retaliation or administrative sanctions will be taken against employees who have reported a possible breach of the Policy, provided that the inaccurate information was not communicated intentionally or with a self-serving purpose.

## **7. Monitoring compliance with the Policy**

44. The Management Board of Kazakhtelecom JSC exercises control over the implementation of the Policy by employees of Kazakhtelecom JSC, monitors and analyses its efficiency and effectiveness.

45. Heads of Kazakhtelecom JSC's structural divisions ensure compliance with the principles and approaches of the Policy by employees of relevant divisions.

## **8. Responsibilities**

46. All employees of Kazakhtelecom JSC, irrespective of their position, shall be held liable for non-performance or improper performance of the Policy.

47. Any employee of Kazakhtelecom JSC, regardless of his/her position, may be subject to appropriate disciplinary action for violation of the principles stipulated by this Policy in accordance with the procedure stipulated by the Labor Code of the Republic of Kazakhstan.

48. Responsibility for monitoring compliance with the Policy is assigned to the Chief Operating Officer of Kazakhtelecom JSC.

## **9. Final provisions**

49. The Policy was approved by the Board of Directors of Kazakhtelecom JSC.

50. Changes and amendments to the Policy shall be made in accordance with the established procedure on the basis of the decision of the Board of Directors of Kazakhtelecom JSC.

51. In order to comply with best practices in the field of human rights, as well as in case of changes in the legislation of the Republic of Kazakhstan and international requirements in the field of human rights, Kazakhtelecom JSC organizes revision of the Policy as necessary.