Appendix 1 to the Decision of the Board of Directors Kazakhtelecom JSC dated "22 "May 2023 No. 24/93

**Equal Opportunities, Inclusion and Diversity Policy** 

#### 1. General provisions

- 1. The Equal Opportunities, Inclusion and Diversity Policy (the "Policy") was developed by Kazakhtelecom JSC to develop equal opportunities, inclusion and diversity practices, taking into account unique personal characteristics and non-discrimination towards employees at all levels, in accordance with advanced international norms and standards with full consideration of the legislation of the Republic of Kazakhstan.
- 2. The provisions of the Policy are voluntary commitments by Kazakhtelecom JSC.
- 3. The Policy is a publicly available document. Kazakhtelecom JSC employees, regardless of their position, shall comply with the requirements of the Policy.
- 4. 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.
- 5. Subsidiaries of Kazakhtelecom JSC are recommended to adopt their own policies in the field of equal opportunities, inclusion, and diversity, based on the principles of this Policy.

# 2. Key terms and definitions used in this Policy

- 6. The following terms are used in this Policy:
- 1) discrimination any distinction, exclusion or preference made on the basis of race, color, sex, religion, political opinion, foreign origin or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation;
- 2) inclusion creating a corporate environment in which different groups of workers and each individual worker is valued, accepted and respected for their unique skills, experience and development prospects;
- 3) diversity the specificity of a working environment that is geared towards welcoming culturally and socially diverse groups and individuals, and assessing their specific skills, competencies, perspectives and other characteristics in an adequate and impartial manner;
- 4) employee a person who has an employment relationship with Kazakhtelecom JSC and directly performs work under an employment contract;
- 5) equality demonstrating respect for the characteristics and factors that cause differences between workers, the abilities and other unique characteristics of workers, and thereby providing equal opportunities for workers;

6) equal opportunities - an approach in which all workers are treated equally and are not influenced by discriminatory factors.

# 3. Key principles

- 7. JSC Kazakhtelecom complies with the legislation of the Republic of Kazakhstan and is also guided by the principles set out in the Equal Remuneration Convention (Convention 100) and the Discrimination (Employment and Occupation) Convention (Convention 111).
- 8. Ensuring equal opportunities, inclusion and diversity for employees is an important factor in the long-term competitiveness of Kazakhtelecom JSC and helps to attract and retain talent, facilitate quality corporate decision-making, and build a competitive development strategy.
- 9. Kazakhtelecom JSC provides its employees with social guarantees in accordance with the requirements of the legislation of the Republic of Kazakhstan.
- 10. Kazakhtelecom JSC is building a corporate culture based on mutual respect of employees, absence of social prejudices and cultural barriers.
- 11. Kazakhtelecom JSC provides a decent, safe and comfortable working environment in which each employee feels respected, accepted and heard and has the necessary authority and rights to perform their job duties.
- 12. Kazakhtelecom JSC encourages transparency in labor relations and helps all employees to develop and build their careers by providing support and creating conditions for professional growth.
- 13. Kazakhtelecom JSC strives to maintain a competitive and decent level of remuneration of employees: the remuneration of all employees of Kazakhtelecom JSC is formed based on objective factors related exclusively to the performance of job duties.
- 14. Kazakhtelecom JSC encourages any initiatives and ideas of employees, the implementation of which may be important for development and improvement of long-term sustainability of Kazakhtelecom JSC's activity.
- 15. Kazakhtelecom JSC takes reasonable measures to maintain the employment of employees who, due to disability, become unable to perform their duties, including by retraining, providing special equipment or reducing working hours.
- 16. Kazakhtelecom JSC seeks to involve women in various aspects of its operations and management processes.
- 17. Kazakhtelecom JSC expresses its commitment to building diverse teams and promoting diversity initiatives, including priority recruitment from the local community, as well as targeted recruitment.

### 4. Key commitments

- 18. Kazakhtelecom JSC does not tolerate discrimination in the field of labor based on origin, social, official or property status, gender, race, language, age or physical disability, nationality, attitude to religion and/or other individual characteristics that are not related to the business qualities of an employee in accordance with the Constitution of the Republic of Kazakhstan.
- 19. Kazakhtelecom JSC guarantees equal treatment of all employees in all aspects of the Company's employment, including recruitment and hiring, career progression, training, conduct at work, disciplinary action, and termination of employment.
  - 20. Kazakhtelecom JSC ensures gender equality in pay for equal work.
- 21. Kazakhtelecom JSC nominates candidates for executive positions based on the qualifications and professional experience of candidates to ensure high quality management and planning through adequate representation of different professional skills, experience and expertise.
- 22. Kazakhtelecom JSC does not allow infringement of human dignity, including any form of harassment, humiliation and harassment. All forms of violence in the workplace are prohibited, including physical and psychological.
- 23. Kazakhtelecom JSC does not tolerate any forms of patronage, attempts to interfere with personal, friendly, family and family relationships in the implementation of the principle of equal opportunities.
- 24. Kazakhtelecom JSC aims to ensure that every employee has the right to receive and provide regular feedback.
- 25. Kazakhtelecom JSC respects the needs of employees with disabilities by focusing on creating a barrier-free environment and ensuring the accessibility of its offices.
- 26. Kazakhtelecom JSC focuses on building a culturally and socially diverse workforce, positioning diversity and inclusion as a competitive advantage.
- 27. Kazakhtelecom JSC respects the diversity of personal values and worldviews and does not prevent employees from openly expressing their views and opinions.
- 28. Kazakhtelecom JSC complies with the labor legislation of the Republic of Kazakhstan: working conditions in Kazakhtelecom JSC comply with the requirements of the legislation of the Republic of Kazakhstan in the field of occupational health and safety, improvement of health protection, as well as with the requirements of relevant internal documents and procedures.
- 29. Kazakhtelecom JSC seeks to establish mentoring programs related to staff diversity, equal opportunities, and non-discrimination in order to support employees, partners and other stakeholders.

- 30. Kazakhtelecom JSC conducts regular analysis of wage levels and remuneration of employees in all positions in order to identify gender and other gaps in remuneration that are not related to their business qualities and seeks to form initiatives to eliminate them.
- 31. Kazakhtelecom JSC aims to increase diversity at all levels, including the Board of Directors, the Management Board, to develop a model of inclusive behavior, prejudice and cultural understanding.
- 32. Kazakhtelecom JSC seeks to develop diversity training for employees and management of the Company.

### 5. Compliance with the principles of the Policy

- 33. Kazakhtelecom JSC carries out regular internal monitoring of its compliance with the principles of the Policy and monitors changes in the legislation of the Republic of Kazakhstan and equal opportunities, inclusion and diversity standards to ensure the relevance of this Policy.
- 34. Kazakhtelecom JSC introduces the principles of this Policy to all stakeholders and strives to provide regular training to employees on the application of this Policy and the procedures governing the approach to diversity and inclusion.
- 35. Kazakhtelecom JSC provides employees with the opportunity to freely report potential violations of the Policy and guarantees the confidentiality of communications.
- 36. 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);
- 2) by contacting the compliance service (tel.: 8 727 259 99 56, 8 800 080 26 62; mail: tlek.issakov@telecom.kz);
  - 3) by contacting their line manager or the head of the division.
- 37. All appeals for non-compliance with this Policy must be received in a timely manner and handled objectively in accordance with the internal procedures for dealing with appeals.
- 38. Kazakhtelecom JSC guarantees that no retaliation or disciplinary action will be taken against employees who have reported a possible non-compliance with the Policy, provided that the inaccurate information was not communicated intentionally or with a self-serving purpose.
- 39. If risks are identified, or violations occur, Kazakhtelecom JSC develops an action plan to address the negative consequences and implements measures to improve equal opportunities, inclusion and diversity practices within a short period of time.

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

- 40. Managers at all levels make ethically sound decisions and avoid actions in their management practices that could harm the personal dignity and legitimate interests of employees.
- 41. The Management Board of Kazakhtelecom JSC shall exercise control over the compliance of Kazakhtelecom JSC's employees with the provisions of this Policy, regularly monitor and analyze its effectiveness and efficiency.
- 42. Heads of Kazakhtelecom JSC's structural divisions ensure that employees of the respective divisions comply with the principles of the Policy.

### 7. Responsibilities

- 43. Each employee of Kazakhtelecom JSC, including officers, is responsible for observing the culture of equal opportunities, diversity and creating an inclusive environment. Kazakhtelecom JSC expects each employee to treat his or her colleagues with respect and to resist any form of pressure and harassment.
- 44. Any employee of Kazakhtelecom JSC, regardless of his/her position, may be subject to appropriate disciplinary actions in accordance with the procedure provided for in the Labor Code of the Republic of Kazakhstan for violation of the principles set out in this Policy.

# 8. Final provisions

- 45. The Policy was approved by the Board of Directors of Kazakhtelecom JSC.
- 46. 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.
- 47. The Policy is reviewed as necessary, as appropriate, for relevance and compliance with legislation of the Republic of Kazakhstan and applicable standards and practices.