

## **POLICY of notification of alleged unethical/illegal actions in Kazakhtelecom JSC**

### **1. General regulations**

1. The Policy of notification of alleged unethical/Illegal actions in Kazakhtelecom JSC (hereinafter - the Policy) determines the procedure for informing about violations of regulatory requirements on anti-corruption issues and internal procedures of Kazakhtelecom JSC (hereinafter - the Company), their consideration, taking measures based on the results of their consideration.

2. This Policy is not applied when considering appeals in accordance with the Law of the Republic of Kazakhstan "On the procedure for considering appeals of individuals and legal entities".

3. The purpose of this Policy is to provide an opportunity for all employees of the Company, business partners and other interested persons to report all serious and demanding special attention problems related to practices that violate the norms of legislation or internal documents of the Company.

4. This Policy is intended to address problems that may have an adverse impact on the work and efficiency of the Company, and which, due to the nature of the problem, cannot be reported via the usual notification line.

At the same time, the Policy is not a way of initiating issues caused by personal dissatisfaction of employees, and its mechanisms should not be considered as a means of settling personal accounts.

5. It is prohibited to use this Policy for the purpose of exerting pressure on the Company's employees and/or forcing them to commit/refrain from committing certain actions.

6. The submission of deliberately false statements is considered as a serious violation that can lead to the application of liability measures in accordance with the established procedure.

7. Terms and definitions used in this Policy:

1) "Hotline" - a line that provides an opportunity to inform about problems that require special attention, which may have an adverse impact on the work and efficiency of the Company;

2) Disciplinary penalty - a measure of disciplinary impact on an employee applied by an employer for committing a disciplinary offense in accordance with the Labor Code of the Republic of Kazakhstan;

3) Audit Committee - Audit Committee of the Board of Directors of the Company;

4) The Management Board of the Company - the collegial executive body of the Company;

5) Employee - a person who has an employment relationship with the Company;

6) The subject - an employee of the Company in respect of whom information about the commission of illegal actions has been received;

7) Compliance Service - a structural subdivision of Kazakhtelecom JSC, whose function is to ensure compliance with mandatory regulatory requirements and international practice on anti-corruption issues;

8) Authorized persons – the Head of the Compliance Service, the Company's Ombudsman, reviewing information about alleged unethical/illegal actions in accordance with the procedure established by this Policy.

8. By adopting this Policy, the Company guarantees:

1) full confidentiality to Employees, business partners and other interested persons who have reported serious problems in Society;

2) absence of harassment and/or discrimination against the Employee who reported the facts of illegal actions;

3) consideration of cases of harassment and/or discrimination of Employees who reported facts of illegal actions as phenomena entailing the application of disciplinary penalties in accordance with the established procedure;

4) refusal of attempts to conceal evidence confirming the facts of illegal actions;

5) the application of disciplinary penalties against persons who have destroyed or concealed evidence confirming the facts of illegal actions.

## **2. Policy Areas**

9. The policy is applied when receiving information about:

1) abuse of official position;

2) negligence causing danger to the life and health of Employees and the population of the Republic of Kazakhstan;

3) data manipulation/reporting of the Company;

4) violations in the financial sphere of the Company, including suspicion of fraud;

5) illegal dissemination of confidential information;

6) violation of regulatory legal acts of the Republic of Kazakhstan, internal documents of the Company;

7) violation of the norms of business ethics enshrined in internal documents;

- 8) causing material and/or image damage to society;
- 9) actions taken for the purpose of concealing or leading to the concealment of the facts specified in subclauses 1)-8) of this clause.

### **3. No discrimination or retaliation**

10. The Company guarantees that no discrimination or retaliatory measures will be taken against Employees who, in the Public interest, report problems based on the information available to them. If an Employee believes that retaliatory measures have been taken against him for reporting a problem, he should report such retaliatory measures to the Compliance Service. Verification of such messages will be carried out confidentially.

### **4. Procedure for providing and reviewing information about alleged unethical/illegal actions**

11. Information about alleged unethical/illegal actions in the Company may be sent to the head of the Compliance Service, or via the communication channels of the "Hotline" indicated on the corporate website in the Compliance section.

12. A report on alleged violations should contain sufficient detail and supporting information to ensure a clear understanding of the issues raised.

13. Authorized persons have the right to request on a confidential basis from structural divisions the necessary information or documents (materials) relevant to the issue under consideration, to receive a written explanation of the Subject on the merits of the issue, as well as attach documents (materials) received from him confirming his explanations and/or refuting the information received.

14. As part of the consideration of the appeal, Authorized persons have the right to access any information regarding the Subject in compliance with the legislation of the Republic of Kazakhstan and internal documents of the Company.

15. The materials of the internal audit are sent by the Compliance Service to the Audit Committee for taking measures on competence.

16. When confirming information about illegal actions by the results of an internal audit, which will allow identifying and preventing material damage to the Company, the Compliance Service has the right to submit to the Board of Directors the issue of encouraging the person who reported this information.

17. In case of receipt of appeals to the Company, in which signs of an offense are seen, they are sent by the executive unit with all the materials available on this issue to the Compliance Service.

The compliance service studies the appeal and the materials received. If there are signs of a criminal offense, the CS sends them to the Management Committee for Financial and Economic Discipline of Kazakhtelecom JSC under the leadership of the Chairman of the Management Board. The members of the steering committee decide on the transfer of materials to law enforcement agencies.

Each fact of the CS is reflected in the quarterly report for the report of the Board of Directors.

18. Upon receipt of an appeal with signs of a criminal or administrative offense against the Chairman of the Management Board, the Compliance Service of the Company is checked.

According to the results of the audit, the specified materials are submitted by the Compliance Service with the attachment of a legal opinion on the presence of the violation to the Board of Directors with the participation of representatives of the Compliance Service and the Security Service of JSC "Samruk-Kazyna", the head of the Compliance Service of the Company, at which the materials provided are reviewed and a decision is made to submit an application to the authorized law enforcement agencies in accordance with the requirements of the legislation.

At the same time, the Compliance Service is responsible for collecting complete, objective, reliable information on the issue under consideration.

## **5. Final regulations**

19. Amendments and additions to this Policy are made in accordance with the established procedure on the basis of a decision of the Board of Directors of Kazakhtelecom JSC.

20. The Company regularly, at least once every two years, reviews this Policy and makes changes and additions to it, if necessary.