

Anti-Corruption Policy **at Kazakhtelecom JSC**

1. General provisions

1. The Anti-Corruption Policy (hereinafter referred to as the Policy) establishes the types of corruption violations, goals and objectives, as well as the principles of anti-corruption in Kazakhtelecom JSC (hereinafter referred to as the Company).

The policy has been developed in accordance with the legislation of the Republic of Kazakhstan, the Articles of Association and other internal documents of the Company.

2. Terms and definitions used in this Policy:

1) administrative and economic functions - the right to manage and dispose of property on the balance sheet of the organization granted in accordance with the procedure established by the law of the Republic of Kazakhstan;

2) close relative - parents (parent), children, adoptive parents, adopted children, full and half brothers and sisters, grandfather, grandmother, grandchildren of the Employees and Officials;

3) bribe - giving or receiving money, securities, other property, rights to property or benefits of a property nature for oneself or other persons for actions (inaction) in favor of the bribe-giver or persons represented by him/her, if such actions (inaction) are within the official powers of this person, or he/she, by virtue of his/her official position, can contribute to such actions (inaction), as well as for general patronage or connivance;

4) “Hotline” - unified centralized channels (Hotline), through which any employee, counterparty, client or other interested party (applicant) of the Company can report the existence of reasonable suspicions and known facts of violations of applicable legal requirements or internal documents of the Company, corruption crimes, illegal actions and other violations by the Company and its Officials and Employees;

5) Officials – members of the Board of Directors and the Management Board of the Company;

6) corruption - the illegal use by officials of their official powers and related opportunities for the purpose of obtaining or extracting personally or through intermediaries property (non-property) benefits and advantages for themselves or third parties, as well as bribery of these persons by providing benefits and advantages;

7) person performing managerial functions - an employee of the Company, permanently, temporarily or by special authority, performing organizational and administrative functions;

8) organizational and administrative functions - the right granted in the manner established by the law of the Republic of Kazakhstan to issue orders and instructions that are mandatory for execution by subordinates in the service, as well as to apply incentive measures and disciplinary sanctions against subordinates in these organizations;

9) gift - material value, including but not limited to:

any type of payment, remuneration, cash, loan, mortgage and/or guarantee, contribution and/or sponsorship, gift, benefit offered or received;

drinks, food and other goods;

individual discounts, securities, gift certificates, invitations to watch sports games, theaters, excursions and other events, discount cards, coupons;

providing employment opportunities, obtaining education or medical care, performing work (providing services);

provision of other property (non-property) benefits and advantages;

10) anti-corruption – actions of the Company’s employees within the limits of their powers aimed at preventing corruption (corruption prevention);

11) Employee - an individual who is in an employment relationship with the Company and directly performs work under an employment contract, including a person performing managerial functions;

12) Head - Chief Director, General Director of the branch, Managing Director, Director for the area of activity of the Central Office/branch and heads of structural divisions of the Central Office and branches of the Company;

13) in-laws – full and half brothers and sisters, parents and children of the spouse of the Employees and Officials.

2. Types of corruption offenses

3. The policy provides for corruption offenses for which liability is provided in accordance with the legislation of the Republic of Kazakhstan:

- 1) giving/receiving bribes and mediation in bribery;
- 2) abuse of official powers;
- 3) obtaining other property (non-property) benefits and advantages, in accordance with anti-corruption legislation;
- 4) misuse or theft of the Company's assets;
- 5) theft or misuse of the Company's inventory;
- 6) use of official powers to obtain monetary remuneration and other benefits;
- 7) violations during the procurement of goods, works, services, expressed in forgery (fraud) of documents, deliberate overestimation or underestimation of prices;
- 8) unauthorized acquisition of confidential information for the purpose of making profit and causing damage to the Company;
- 9) negligence;
- 10) official forgery.

3. Goals and objectives of the Policy

4. The main goal of this Policy is to develop a culture of Officials and Employees of the Company that rejects corruption and ensures the principles of anti-corruption.

5. The objectives of this Policy are:

- 1) creating an atmosphere of intolerance towards corruption in the Company;
- 2) prevention of corruption offences;
- 3) identifying the conditions and causes conducive to the commission of corruption offenses and eliminating their consequences;
- 4) instilling in Officials and Employees strict compliance with the legislation of the Republic of Kazakhstan and internal documents of the Company.

4. Basic principles of anti-corruption

6. Anti-corruption efforts in the Company are based on the following basic principles:

- 1) legality of the Company's activities;
- 2) publicity and openness of the Company's activities;
- 3) conducting anti-corruption propaganda among employees, partners and clients of the Company;
- 4) cooperation in the field of anti-corruption activities with state bodies, as well as partners and clients of the Company;
- 5) mandatory conduct of internal inspections on facts of violations of anti-corruption legislation and internal policies of the Company;
- 6) protection and encouragement of persons providing assistance in combating corruption;
- 7) commitment of Officials to the principles of anti-corruption provided for in this Policy and establishing a "tone from the top";
- 8) the inevitability of punishment for committing corruption offenses.

5. Application area

7. This Policy applies to all Officials and Employees of the Company. The basic principles of anti-corruption established by this Policy also apply to third parties interacting with the Company.

6. Anti-corruption restrictions

8. In order to prevent the Officials and Employees of the Company from taking actions that could lead to their misuse of their powers for personal and non-official interests, these persons undertake anti-corruption restrictions on:

- 1) the inadmissibility of joint service (work) of close relatives, spouses and relatives who are directly subordinate;
- 2) the use of official and other information that is not subject to official dissemination in order to obtain or extract property and non-property benefits and advantages;

3) accepting material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions are within the official powers of the persons, or these persons, by virtue of their official position, can facilitate such actions (inaction).

9. Officials and persons performing managerial functions, within the framework of anti-corruption restrictions, are prohibited from:

1) independently participate in the management of an economic entity, if management or participation in the management of an economic entity is not included in their official duties in accordance with the legislation of the Republic of Kazakhstan, contribute to the satisfaction of the material interests of organizations or individuals through the unlawful use of their official powers in order to obtain property or other benefits;

2) engage in entrepreneurial activity, with the exception of the acquisition and (or) sale of shares of open-ended and interval mutual investment funds, bonds on the organized securities market, shares of commercial organizations on the organized securities market;

3) engage in other paid activities, except for teaching, scientific and other creative activities.

Officials and persons performing managerial functions have the right to hold paid positions in management bodies, supervisory boards, executive bodies of subsidiaries, dependent organizations of relevant entities of the quasi-public sector and other legal entities that are affiliated with them in accordance with the laws of the Republic of Kazakhstan.

10. The consent of Officials and Employees to the adoption of anti-corruption restrictions is recorded by the HR department of the Central Office/branch of the Company in written form.

11. Failure to accept anti-corruption restrictions by an official or a person performing managerial functions entails dismissal from office (dismissal from office, termination of powers) in accordance with the legislation of the Republic of Kazakhstan, and for a candidate for the relevant position - refusal to hire the position.

7. Cooperation in the field of anti-corruption

12. The Company, based on the principle of reciprocity, cooperates in the field of anti-corruption with state bodies, partners, and clients of the Company for:

- 1) identifying persons suspected (accused) of committing corruption offenses, offenses creating conditions for corruption, their location;
- 2) identifying property obtained as a result of committing corruption offenses or serving as a means of committing them;
- 3) exchange of information on anti-corruption issues;
- 4) coordination of activities to prevent and combat corruption.

8. Measures to prevent corruption

13. Prevention of corruption in the Company is carried out by applying the following basic measures:

- 1) developing intolerance towards corrupt behavior among Officials and Employees of the Company;
- 2) conducting an internal analysis of corruption risks;
- 3) requiring partners to fulfill obligations to combat corruption and inform the Company about any violations in accordance with concluded agreements;
- 4) conducting constant monitoring of external regulatory requirements and best international practices on anti-corruption issues;
- 5) assessing the exposure of the Company's key business processes to corruption risks;
- 6) regular training on anti-corruption issues followed by online testing for knowledge of the Company's internal policies;
- 7) introduction of a proactive reporting line "Hotline" about alleged violations of regulatory requirements on anti-corruption issues;
- 8) conducting an internal/official investigation in the Company, an internal audit based on received information.

9. Corruption risk assessment

14. The Compliance Service, in interaction with interested structural divisions of the Company and in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Company, conducts an internal assessment of corruption risks.

15. The purpose of identifying and assessing corruption risks is to identify those types of activities and business processes of the Company that are subject to the risks of non-compliance with anti-corruption legislation, and where there is a high probability of committing corruption offenses, both for the purpose of obtaining personal benefit and for the purpose of obtaining benefit by the Company.

16. Identification and assessment of corruption risks is carried out on the basis of anti-corruption monitoring and internal analysis of corruption risks.

17. The procedure for identifying and assessing corruption risks, developing measures to minimize them is regulated by the legislation of the Republic of Kazakhstan and internal documents of the Company.

18. Based on the results of the internal analysis of corruption risks, an analytical report containing information on identified corruption risks and recommendations for their elimination is compiled and sent to the Chairman of the Management Board of the Company for consideration and action.

10. Participation in charitable, sponsorship and political activities

19. The Company does not finance charitable and sponsorship projects in order to obtain or maintain an advantage in its activities.

20. The Company, Officials and Employees of the Company do not finance political parties, public associations in order to obtain or maintain an advantage in their activities.

21. Officials and Employees of the Company, when participating in public associations, are prohibited from offering, giving, promising, or making payments, contributing property, giving gifts on behalf of the Company in order to obtain or maintain an advantage for the activities of the Company.

11. Gifts and Hospitality Expenses

22. In accordance with the Code of Business Ethics of Kazakhtelecom JSC and the legislation of the Republic of Kazakhstan, the Company prohibits Officials and Employees, as well as members of their families to receive material remuneration, gifts or services provided for the actions (inaction) of this person in favor of the persons who provided material remuneration, gifts or services, if such actions (inaction) are within the official powers of this person or, by virtue of his/her official position, he/she can contribute to such actions (inaction).

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

24. The implementation of hospitality expenses, including business hospitality of the Company with third parties, must meet the following criteria:

1) fully comply with the norms of the current legislation of the Republic of Kazakhstan, the Code of Business Ethics of Kazakhtelecom JSC and other internal documents of the Company;

2) be reasonably justified, proportionate and not to be luxury goods;

3) not to constitute a hidden reward for a service, action, inaction, connivance, patronage, provision of rights, making a certain decision on a transaction, agreement, license, permit, etc., or an attempt to influence the recipient for an illegal or unethical purpose;

4) the hospitality is not intended and cannot be perceived as intended to influence or induce a person to act in a particular way, or to reward that person for the performance of his/her role or function;

5) not create a reputational risk for the Company and its employees, as well as other persons in the event of disclosure of information about gifts or hospitality expenses;

6) the hospitality is appropriate and within the scope of this Policy and does not violate the applicable third party's hospitality policy;

7) any manifestation of hospitality must be carried out in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Company;

8) it is not allowed to offer hospitality and gifts to civil servants, persons performing managerial functions in entities of the quasi-public sector and members of their families. It is also not allowed to offer or give gifts if it is known that acceptance of the gift is unacceptable to the recipient.

25. Officials and Employees of the Company avoid giving and/or accepting gifts and hospitality, as such actions will show undue influence or create the appearance of such influence on Officials, Employees and business partners of the Company.

12. Actions incompatible with the activities of the Company

26. The following actions are considered unacceptable and incompatible with the activities of the Company:

1) direct or indirect promise, offer or permission to acquire or receive any value, position, assistance in the purchase of goods, work or services, or other material (intangible) benefit or advantage that is contrary to the interests of the Company;

2) offer to any individuals and legal entities or acceptance by Officials and Employees of the Company of property benefits not provided for by the laws of the

Republic of Kazakhstan and (or) internal documents of the Company (including the so-called “rollback”, loan, fee, reward, discount or other benefit);

3) payments to fictitious organizations or organizations whose ownership structure is not transparent;

4) payments to legal entities owned or controlled by persons authorized to perform government functions and persons equated to them, their close relatives, spouses, in-laws;

5) transfer and/or receipt of illegal remuneration in the form of cash, bonds and other securities;

6) receiving/offering unreasonable discounts;

7) giving and/or receiving gifts, including in the form of cash;

8) hiring persons who have previously committed corruption offenses;

9) misappropriation of tangible and intangible assets through deception or abuse of trust.

13. Fees for simplification of formalities

27. This Policy prohibits the payment or acceptance of payments as fees for simplification of formalities. Fees for simplification of formalities mean payments made to Officials and Employees of the Company to perform or expedite routine procedures.

14. Obligations

28. Officials and Employees of the Company in their professional activities must strictly observe the following standards of conduct:

1) comply with the requirements of the legislation of the Republic of Kazakhstan, this Policy and other internal documents of the Company;

2) be honest and decent in business relations, refrain from any dishonest methods of performing official duties;

3) prevent the commission of actions that could discredit the Company;

4) not use official position, confidential and insider information, tangible and intangible assets of the Company for personal purposes;

5) not allow unlawful actions that may raise suspicions regarding their legality and ethics;

6) support and demand from colleagues the compliance with a high legal anti-corruption culture;

7) not to induce other Employees to commit corruption offenses and not to encourage such actions;

8) refrain from participating in any activities or making decisions that could potentially lead to a conflict of interest;

9) not hold positions directly subordinate to positions occupied by their close relatives, spouse and (or) in-laws, and also have close relatives, spouse and (or) in-laws subordinate to them.

29. Heads are obliged to work to create an anti-corruption culture in the supervised structural divisions of the Company.

15. Liabilities

30. The head is personally responsible for compliance with the principles and requirements of this Policy by subordinate employees and the managed unit as a whole.

31. The head who independently identifies and informs about the fact of a corruption offense in the activities of a managed structural unit or in the actions of his/her subordinate employees is exempt from liability.

32. Officials and Employees who become aware of a corruption offense in the activities of their structural unit are required to report this to the Compliance Service. At the same time, the Compliance Service ensures complete confidentiality of this message.

33. Officials and Employees for committing corruption offenses are liable in accordance with the current legislation of the Republic of Kazakhstan.

34. The Chairman of the Management Board of the Company bears disciplinary liability in accordance with the laws of the Republic of Kazakhstan for failure to fulfill or improper performance of official duties to prevent the commission of corruption offenses by subordinate employees.

35. The Chairman of the Management Board of the Company bears disciplinary responsibility for the commission of corruption crimes by Employees under the totality of the following conditions:

1) a connection has been established between the corruption crime committed by the Employee and the guilt of failure to perform or improper performance of official duties to prevent the commission of corruption offenses;

2) in relation to the Employee there is a judicial act that has entered into legal force finding him/her guilty of committing a corruption criminal offense or the criminal case for committing a corruption crime has been terminated by the criminal prosecution body or the court on the basis of clauses 3), 4), 11) and 12) of part one of Article 35 or Article 36 of the Criminal Procedure Code of the Republic of Kazakhstan.

16. Final provisions

36. Officials and Employees of the Company undertake to carefully study, understand and strictly follow the requirements established by this Policy. After reading the provisions of this Policy, the Company's employees must fill out the appropriate "Confirmation" form, which will be kept in the personal file of the Company employee.

37. Officials and Employees of the Company must undergo training in the application of the anti-corruption policy and internal procedures in this area, sign a form confirming completion of the training and familiarization with the specified documents.