

**Appendix 2**  
**to the Decision of the Board of Directors**  
**Kazakhtelecom JSC**  
**dated "22 "May 2023**  
**No. 24/93**

**Local Community Engagement Policy of Kazakhtelecom JSC**

## **1. General provisions**

1. The Local Community Engagement Policy (hereinafter - the Policy) defines uniform principles of Kazakhtelecom JSC (hereinafter - the Company) on managing interaction with local executive bodies, public organizations, and local communities in the regions where the Company operates (hereinafter - local communities) and is aimed at maintaining favorable constructive relations with them.

2. The Policy is a public document and is based on the principles set out in the following international documents: the UN Global Compact, the Universal Declaration of Human Rights, the UN Sustainable Development Goals, as well as the International Finance Corporation (IFC) Environmental and Social Sustainability Performance Standards and the Global Reporting Initiative).

3. This Policy is designed to make a positive contribution to the socio-economic development of local communities and ensure that the needs and interests of local communities are considered in the activities of Kazakhtelecom JSC. The principles set out in this Policy define the initiatives on interaction with local communities considering the applicable national legislation.

4. This Policy should be read jointly with the Corporate Governance Code, Sustainability Policy, Stakeholder Engagement Policy and other applicable Company policies and procedures.

5. Terms and definitions used in this Policy:

1) «Hotline» – a line that provides an opportunity to report problems requiring special attention that may have an adverse effect on the operation and performance of the company;

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) Employee – a person who has an employment relationship with the company and directly performs work under an employment contract;

5) Local communities – groups of people living or working in areas affected or likely to be affected by the Company's activities.

## **2. Application area**

6. This Policy applies to the activities of all employees and divisions of the Company.

7. To implement this Policy, the Company shall implement internal procedures regulating interaction with local communities in all regions of its presence in accordance with the legislation of the Republic of Kazakhstan and this Policy. To the extent possible, the Company also expects business partners and other stakeholders of the Company to comply with the main provisions and principles of this Policy. As part of the 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.

### **3. Key principles**

8. The company ensures its contribution to the promotion of social and economic development in the regions where it operates in the course of its business activities.

9. The company aims to contribute to improving the quality of life of local communities in the regions where it operates.

10. The company maintains a supportive and constructive relationship with local communities, considering their views, interests, perspectives and preferences.

11. The company complies with the legislation of the Republic of Kazakhstan and the requirements of international standards for interaction with local communities.

12. Kazakhtelecom JSC seeks to minimise social and environmental risks and impacts on local communities in the regions where it operates.

### **4. Commitments**

13. Kazakhtelecom JSC undertakes to consider the interests and needs of the local community in its activities.

14. Kazakhtelecom JSC makes social investments considering the interests and needs of the local population, including active participation in the development of infrastructure in the regions where it operates.

15. Kazakhtelecom JSC participates in the social and economic development of the region by fulfilling its tax obligations, and also provides employment for the local population in the regions of its presence by creating jobs.

16. Kazakhtelecom JSC on a regular basis builds a dialogue with local communities based on respecting their interests during its activities.

17. Kazakhtelecom JSC timely performs the procedure of identification of stakeholders in the regions of its presence in accordance with the Communication Plan of Kazakhtelecom JSC on interaction with the Company's stakeholders.

18. Kazakhtelecom JSC analyses and takes into account the interests and opinions of employees, partners and other stakeholders, including local communities, when planning and implementing projects in the course of its activities.

19. Kazakhtelecom JSC ensures that feedback systems are in place, including grievance mechanisms (including anonymous appeals).

## **5. The main ways of local communities engagement**

20. Providing up-to-date information through media publications on development plans, on the results of Kazakhtelecom JSC's sustainable development performance.

21. Conducting surveys and questionnaires through the corporate media to determine the opinion of local communities on events planned by the Company in the regions where it operates.

22. Dealing with feedback channels.

23. Planning and implementation of social investment and charitable activities as part of socio-economic support for the regions where we operate.

24. Engage in direct dialogue through participation in joint meetings, working groups and standing committees with local communities.

25. Building joint effective development work in the regions where we have a presence with government representatives.

## **6. Policy enforcement**

26. Kazakhtelecom JSC carries out regular internal monitoring of its compliance with the principles of this Policy and monitors changes in the legislation of the Republic of Kazakhstan and international standards in the field of sustainable development, which include provisions on interaction with local communities.

27. Kazakhtelecom JSC introduces the provisions and principles of this Policy to its employees.

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

29. 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);

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

30. 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.

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

31. The Management Board of Kazakhtelecom JSC shall exercise control over the implementation of this Policy by the employees of Kazakhtelecom JSC, monitor and analyze its efficiency and effectiveness.

32. Heads of Kazakhtelecom JSC's structural divisions shall ensure that employees of the relevant divisions comply with the principles and approaches of this Policy.

33. All employees of Kazakhtelecom JSC, regardless of their position, shall be liable for failure to comply with or improper compliance with this Policy.

## **8. Final provisions**

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

35. Amendments and additions to this Policy shall be made in accordance with the established procedure based on the decision of the Board of Directors of Kazakhtelecom JSC, including in order to comply with the best practices in the field of interaction with local communities, as well as in case of changes in the legislation of the Republic of Kazakhstan and international requirements.

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