

Title: <b>KazMunayGas Group Anti-Corruption Policy</b>		
Type: <b>Policy</b>	<b>KMG-VND-4058.2-47</b>	<b>p. 1 of 27</b>
Drafted by: Sh. Nurbayeva dated _____ 20__ г.	Checked by: G. Moldagaliyeva dated _____ 20__ г.	Approved by the Board of Directors of KazMunayGas minutes No. dated _____ 20__, _____

## 1. PURPOSE OF THE DOCUMENT AND GENERAL PROVISIONS

1.1. The present KazMunayGas Anti-Corruption Group Policy (hereinafter – Policy) was developed in accordance with the Law of the Republic of Kazakhstan “On Anti-Corruption”, other legislative acts of the Republic of Kazakhstan in the field of combating corruption, as well as internal regulations governing the activities of KMG.

1.2. JSC NC KazMunayGas is convinced that one of the most important conditions for sustainable business development is strict compliance with legislation regulating anti-corruption relations.

1.3. JSC NC KazMunayGas declares its categorical rejection of dishonest and illegal methods of doing business and voluntarily assumes additional obligations in the area of prevention and control of corruption, recommended by Kazakhstan, foreign and international bodies and organizations.

1.4. The KazMunayGas Group Anti-Corruption Policy (hereinafter - the Policy) discloses the goals and objectives of the Company in the field of counteracting involvement in corrupt activities, defines the legal basis and key principles of this counteraction, describes the measures taken by the Company to prevent corruption, establishes the anti-corruption responsibilities of Employees and other persons, as well as liability for failure to comply (improper compliance) with the provisions of the Policy.

1.5. This Policy was developed for the purposes of:

- ensuring compliance of the Company’s activities with the requirements of Kazakhstan legislation and other applicable laws of the country of incorporation of KMG’s subsidiaries and affiliates, as well as international treaties ratified by both the Republic of Kazakhstan and the country of incorporation of the subsidiaries and affiliates, regulating relations in the area of preventing and combating corruption, high standards and business ethics;

- minimizing the risks of the Company and its Employees being involved in corrupt activities;

- formation of a unified view of the Company as one that denies corruption in any of its forms and manifestations among Employees and Officials, shareholders, investors, Contractors, representatives of government agencies, and other stakeholders;

- creation of a local regulatory framework governing the Company’s activities to combat involvement in corruption.

1.6. The objectives of this Policy are:

- defining the goals, anti-corruption and fraud objectives and principles of the Company;

- prevention, detection, suppression and disclosure of illegal acts, as well as the identification of persons preparing, committing or having committed them;
- identification of the main corruption and fraud risks and determination of measures to minimize and/or eliminate them;
- formation of the Company's corporate culture with the aim of anti-corruption and fraud;
- implementation of anti-corruption procedures in the Company based on applicable anti-corruption legislation and communicating them to the Company's Employees and other stakeholders;
- establishing the obligation of Employees and Officials to comply with the principles, restrictions and requirements set out in the Policy;
- providing information channels for reporting incidents of corruption;
- explanation of the measures taken by the Company to prevent corruption.

1.7. This Policy emphasizes the Company's commitment to high ethical standards of business conduct and maintaining its business reputation. The Company recognizes that its reputation as an honest and conscientious organization is one of its most valuable assets, believing that corruption poses a threat to its business and values. The Company's firm anti-corruption position is one of the fundamental principles of doing business.

1.8. The Company prohibits Employees and Officials from committing corruption offenses or bribery in any form, carried out directly or through the involvement of third parties (Intermediary), throughout the world, the Company openly declares its non-acceptance of corruption and voluntarily assumes additional obligations in the area of preventing corruption offenses.

1.9. The Company strictly prohibits Employees and Officials from making Incentive Payments to Politically Exposed Persons on behalf of KMG or its subsidiaries and affiliates, including making such payments through intermediaries.

1.10. This Policy is posted on the official KMG website on the Internet and in the electronic document management system.

## **2. SCOPE**

2.1. The Policy is mandatory for all Employees and Officials.

2.2. The Policy applies to:

2.2.1. KMG;

2.2.2. subsidiaries and affiliates of KMG;

2.2.3. joint ventures and associated organizations of KMG, in the absence of objections from other shareholders/participants of such joint venture and associated organization;

2.3. If the internal regulatory documents of the subsidiaries and affiliates or the legislation of the countries of the subsidiaries and affiliates location establish stricter requirements than the provisions of the Policy, then the provisions of the internal regulatory documents of the subsidiaries and affiliates or the requirements of the legislation

of the country of incorporation of such subsidiaries and affiliates shall apply. At the same time, the provisions of the Policy shall apply to relations not covered by the internal documents of the S&As or the legislation of the country of incorporation of the S&As.

2.4. Restrictions and prohibitions established by the anti-corruption legislation of the Republic of Kazakhstan shall apply in relation to citizens of the Republic of Kazakhstan appointed to subsidiaries and affiliates registered in foreign countries.

2.5. The Company recommends that its Counterparties strictly adhere to the requirements of this Policy and ensure that their employees comply with the requirements of the Policy.

2.6. The Policy may be applied in the subsidiaries and affiliates by developing and approving similar policies or bringing the internal documents of the subsidiaries and affiliates into compliance with this Policy , taking into account the specifics and particularities of the subsidiaries and affiliates' activities . At the same time, the requirements provided for in this Policy in similar policies and internal documents of the subsidiaries and affiliates must not be reduced.

### 3. DEFINITIONS AND ABBREVIATIONS

3.1. The following definitions and abbreviations shall apply for the purposes of this Policy:

<b>Active bribery</b>	Offering, promising, authorizing or paying bribes (directly or indirectly), or aiding or abetting such conduct.
<b>Close relatives</b>	Parents (parent), children, adoptive parents, adopted children, full and half siblings, grandfather, grandmother, grandchildren.
<b>Bribe</b>	1) material assets (items or money) or any property benefit or services for an action (or, conversely, inaction), in the interests of the bribe giver or another third party in favour of a Politically Exposed Person, which this Politically Exposed Person could or should have committed by virtue of his/her official position; 2) material assets (items or money) or any property benefit or services for an action (or, conversely, inaction), in the interests of the bribe giver or another third party in favour of the Employee or Official.
<b>Official</b>	A person who permanently, temporarily or by special authority performs organizational and managerial or administrative and economic functions in KMG, KMG's subsidiaries and affiliates;
<b>S&amp;As</b>	Subsidiaries and affiliates, including joint ventures and associated organizations of KMG
<b>Stakeholders</b>	Individuals, legal entities, groups of individuals or legal entities that influence or may be influenced by the activities of the Fund and/or the organization, their products or services and related actions by virtue of the provisions of legislation, concluded agreements (contracts) or indirectly (mediately); this definition

	does not apply to all those who may be familiar with the Fund and the organization or express an opinion about them; the main representatives of stakeholders are shareholders, employees, clients, suppliers, government agencies, subsidiaries, bondholders, creditors, investors, public organizations, the population of the regions in which the Fund or organization operates.
<b>KMG</b>	JSC NC KazMunayGas
<b>Company</b>	JSC NC KazMunayGas and its S&As
<b>Commercial bribery</b>	The illegal transfer of money, securities or other property to a person performing managerial functions in a commercial or other organization, as well as the illegal provision of property services to him/her for the use of his/her official position, as well as general patronage or connivance in service in the interests of the person committing the bribery.
<b>Compliance system</b>	The system of internal control over the Company's processes, their policies, procedures, measures taken for the Company to ensure the achievement of anti-corruption goals, including the implementation of an effective set of preventive (warning) measures to prevent violations of applicable anti-corruption legislation, the requirements of industry standards and internal documents of the Company, as well as measures to identify and suppress facts of corruption and other violations (abuses) in order to ensure high professional and ethical standards, minimize the risks of non-compliance with the legislation of the Republic of Kazakhstan and applicable international law, prevent significant financial losses or loss of reputation of the Company.
<b>Compliance function</b>	A process managed by an authorized structural subdivision of the Company, whose main task is to build an effective compliance system in the Company, monitor compliance risk management and perform other functions stipulated by the Company's internal documents .
<b>Counterparty</b>	An individual or legal entity, regardless of citizenship, residency or place of registration, with whom the Company has entered into or plans to enter into an agreement/contract, including, but not limited to, for the provision of various types of consulting and other services.
<b>Conflict of interest</b>	Any situations or circumstances in which the Personal Benefit or activities of an Employee or Official are contrary to the interests of the Company or may potentially conflict with them and thereby may lead to improper performance of their official

	duties and the objectivity of decisions on issues related to the Company.
<b>Corruption</b>	Offer, promise, provision, demand and/or receipt of an illegal benefit, material or non-material, in any form, directly or through intermediaries, including in the form of a bribe and commercial bribery; and/or Mediation in the implementation of a corrupt act; and/or abuse of official position, abuse of authority, as well as other illegal use by an Employee or Official, as well as another person of their official position contrary to the legitimate interests of the Company, including for the purpose of obtaining an illegal benefit, material or non-material, for themselves or third parties, or the illegal provision of such benefit to the said person by other individuals.
<b>Corruption offence</b>	An unlawful, guilty act (action or inaction) that has signs of corruption, associated with the use of one's official position or the deliberate failure to fulfil one's official duties, in order to obtain personal gain, which facilitates the commission of corrupt acts or the concealment of an already committed offense, for which administrative or criminal liability is established by law .
<b>Corrupt act</b>	Unlawful use of official position by an Employee, related to personal gain or provision of benefits to third parties to the detriment of the interests of the Company or the state, for which administrative or criminal liability is not established by law , but which violates the provisions of this Policy.
<b>Seconding party</b>	An organization that has entered into an agreement with the Company for the provision of personnel services (outstaffing) in the current year
<b>Passive bribery</b>	A request or agreement to accept or receive a bribe, directly or indirectly.
<b>Politically exposed person</b>	<ol style="list-style-type: none"> <li>1) Civil servant – a citizen of the Republic of Kazakhstan or a foreign state who holds a government position in a government body and exercises official powers for the purpose of implementing the tasks and functions of the state;</li> <li>2) An official of a government body is a person who, permanently, temporarily or by special authority, exercises the functions of a representative of the authorities or performs organizational and managerial or administrative and economic functions in government bodies;</li> <li>3) Foreign official - an official of a foreign state, including members of a foreign public assembly, officials of international organizations, members of an international parliamentary assembly, judges of a foreign state and officials of an</li> </ol>



	international court, as well as officials in the armed forces and other military formations of a foreign state.
<b>Mediation in bribery/commercial bribery</b>	Assisting the bribe-taker and the bribe-giver in reaching or implementing an agreement between them on receiving and giving a bribe, including the direct transfer of a bribe/item of commercial bribery (illegal remuneration) on the instructions of the bribe-giver/person transferring the item of commercial bribery, or the bribe-taker/person receiving the item of commercial bribery, or other assistance to the bribe-giver and/or the bribe-taker/participating persons in reaching or implementing an agreement between them on receiving and giving a bribe/commercial bribery.
<b>Anti-corruption</b>	Activities of Employees and Officials to prevent (proactive management) corruption, including the formation of an anti-corruption culture, the identification and elimination of the causes and conditions that contribute to the commission of corruption offenses, as well as the identification, suppression, disclosure and investigation of corruption offenses and the elimination of their consequences.
<b>Prevention of risks of corruption activities</b>	Activities aimed at introducing elements of corporate culture, organizational structure, rules and procedures regulated by internal documents, ensuring the prevention of corruption offenses in the Company.
<b>Employee</b>	A person who is in an employment relationship with the Company and directly performs work under an employment contract, as well as other persons engaged on the basis of an employment contract concluded with the Seconding Party in accordance with the contract for the provision of personnel services (outstaffing ).
<b>Relatives</b>	Brothers, sisters, parents and children of the spouse.
<b>Compliance service / authorized structural subdivision for compliance function</b>	The structural division of the Company responsible for compliance issues.
<b>Country of incorporation</b>	The state in under the legislation of which the S&A is registered.
<b>Incentive payments</b>	Payments to Politically Exposed Persons for the purpose of expediting routine official actions (e.g., issuing permits, licenses or other official documentation; issuing visas, work permits and other immigration documentation; expediting the receipt of permission to release goods from customs; expediting state registration of real estate or vehicles; expediting the provision of

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	utilities or other services (e.g., telecommunications, security), etc.
<b>Family members of persons equated to perform public functions</b>	spouse, parents, children, including adults, and persons dependent on him/her and permanently residing with him/her.
<b>CEO/Chair of the Management Board</b>	Chief Executive Officer.
<b>CEO-1</b>	The management level below the position of Chair of the Management Board (CEO) in accordance with the organizational structure (executive and managerial employees, chief of staff, department directors directly reporting to the CEO).
<b>CEO-2</b>	The management level below CEO-1 in accordance with the organizational structure (department directors, head of the dispatch and analysis centre, heads of units, services, divisions, directly reporting to CEO-1).
<b>ABMS</b>	Anti-bribery management system.

## 4. RESPONSIBILITY

### 4.1. Employees/Officials, when performing their official duties, shall:

- 1) read the Policy and sign a commitment to comply with the Policy. The commitment is drawn up as an appendix to the employment contract or civil law contract, in the form according to Appendix No. 1 to the Policy;
- 2) be guided by the memo, in accordance with Appendix No. 2, which lists the basic concepts and examples of unacceptable corrupt behaviour;
- 3) take into account compliance with the Policy when assessing the business qualities of the Employee, including in the event of his/her appointment to a higher position, and when resolving other personnel issues;
- 4) strictly comply with the restrictions and requirements provided for by the Policy, including those related to giving, receiving gifts, incurring entertainment expenses, charitable and sponsorship activities, participation in political activities, interaction with government representatives, politically significant persons and public organizations, with Counterparties, intermediaries, third parties, preventing Conflicts of Interest, and maintaining records;
- 5) strictly observe the categorical prohibition on the following actions:
  - participate in corrupt activities, including offering, promising, or giving bribes to Politically Exposed Persons;
  - ask for and receive Bribes or offer or receive Commercial Bribery;
  - participate in commercial bribery of Counterparties or Counterparties of Employees/Officials, be in any way interested in concluding a contract or agreement with a specific Counterparty, unreasonably insist on the involvement of a specific Counterparty

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(whether it is represented in a consortium or independently) and, when choosing a Counterparty, fail to take into account the interests of the Company;

- make payments to simplify administrative, bureaucratic and other formalities in any form, including in the form of cash or its equivalents, valuables, services or other benefits of a property or non-property nature, to any persons and from any persons or organizations, including commercial and non-profit organizations, government bodies and local governments, Politically Exposed Persons, in order to obtain benefits for themselves, for the Company or for third parties.

6) Officials, when performing their official duties, must strictly observe the categorical prohibition on receiving bribes from the Company's Counterparties and other third parties, as well as initiating, offering and giving a Bribe both personally and through intermediaries, whether from among the Employees or other third parties;

7) comply with anti-corruption requirements and restrictions established by other internal documents of the Company (to the extent that they do not contradict the Policy);

8) Officials, when performing their official duties, must accept the anti-corruption restrictions established by the current anti-corruption legislation in accordance with Appendix No. 4 to the Policy.

9) Submit declarations of assets and liabilities, and income and property within the deadlines and in the manner established by the tax legislation of the Republic of Kazakhstan.

**4.2. When interacting with Counterparties, Employees/Officials shall:**

- 1) establish and maintain business relations only with those Counterparties who conduct business relations on a conscientious and honest basis;
- 2) take care of its own reputation;
- 3) demonstrate support for high ethical standards in conducting business activities;
- 4) take their own anti-corruption measures.

**4.3. Compliance service /authorized structural subdivision for the compliance function is responsible for:**

1) introduction of a procedure for checking Counterparties in order to reduce the risk of the Company, Employees or Officials being involved in corrupt activities and other unfair practices (including the collection and analysis of publicly available information about potential Counterparties, such as their reputation, length of activity in the market, participation in corruption scandals, etc.).

2) posting information about anti-corruption measures taken by the Company on the official website of the Company;

3) updating the Policy;

4) organizing the explanation of the Policy to Employees and Officials;

5) maintaining and improving the Anti-Bribery Management System and improving the compliance function.



**4.4. Legal Support Department** is responsible for including provisions on compliance with anti-corruption standards in contracts concluded with Counterparties - an anti-corruption clause in the form provided for in Appendix No. 3.

**4.5. Human Resources Management Department** is responsible for:

- 1) recording consent to the adoption of anti-corruption restrictions by Employees and Officials ;
- 2) one-time submission of declarations of income and property, assets and liabilities by Officials upon conclusion of an employment contract.
- 3) taking measures against Employees and Officials who violate the Policy.

## **5. REGULATORY LEGAL FRAMEWORK**

5.1. This Policy has been drawn up taking into account the legislation of the Republic of Kazakhstan, international anti-corruption legislation and internal documents of the Company.

5.2. When drafting this Policy, the contents of the following documents were taken into account:

- Criminal Code of the Republic of Kazakhstan dated 3 July 2014;
- Law of the Republic of Kazakhstan dated 18 November 2015 “ On anti-corruption”;
- KMG Code of Business Ethics;
- Policy for resolving conflicts of interest among KMG Employees and Officials;
- National standard of the Republic of Kazakhstan on Anti-bribery management systems ST RK ISO 37001-2017.

5.3. The main requirements of the said acts in the part concerning commercial organizations are:

- prohibition of giving bribes or objects of commercial bribery;
- prohibition of bribery of Politically Exposed Persons;
- prohibition of Mediation;
- prohibition of receiving bribes or objects of commercial bribery.

## **6. KEY ANTI-CORRUPTION PRINCIPLES**

In the course of its activities, the Company is guided by the following principles of combating corruption:

6.1. **“zero tolerance” principle** (non-acceptance of Corruption in any form or manifestation) – a complete prohibition for Employees and Officials, as well as other persons acting on behalf of the Company and/or in its interests, directly or indirectly, personally or through any Intermediary, to participate in corrupt actions, regardless of the practice of doing business in a particular country;

6.2. **“Tone from the Top” principle** – Officials, by their behaviour, set an example for the Company’s Employees in observing and promoting high ethical standards of doing business and not accepting corruption in any of its manifestations;

6.3. **due diligence principle** – the adoption of a set of measures and actions aimed at obtaining the necessary and reliable information about the Counterparty in order to minimize the risk of corruption in business relations with Counterparties;

6.4. **the corruption prevention principle** – the Company takes preventive measures in advance to prevent corruption, i.e., the introduction of elements of corporate culture, organizational structure, rules and procedures aimed primarily at identifying corruption risks and minimizing them;

6.5. **the inevitability of punishment principle** – the Company declares an irreconcilable attitude towards any forms and manifestations of Bribery, fraud and Corruption at all levels of corporate governance. The guilty persons are brought to justice regardless of their position and length of service in the Company and other relationships with it in the manner established by law and the internal documents of the Company;

6.6. **monitoring and control** – the Company monitors the implemented procedures for preventing and combating corruption, controls their compliance and regularly improves them;

6.7. **cooperation in the field of combating corruption** – the Company recognizes the general social nature of the problem of corruption and the need to combat it both through measures implemented within the framework of state policy and by developing intolerance to corruption on the part of Employees, Officials and Contractors of the Company;

6.8. **Involvement of Employees and Officials in combating corruption** - the Company aims to form a personal position of non-acceptance of corruption in any of its forms and manifestations by Employees and Officials. For these purposes, the Company takes all necessary measures to introduce the Policy at all levels of the organization and to communicate its contents to its Employees and Officials, as well as other stakeholders. The Company promotes an increase in the level of anti-corruption culture of Employees and Officials by regularly training them in the basic requirements of the Policy and applying it in practice;

6.9. **maintaining reliable reporting principle** - the Company strictly observes the requirements of legislation and the rules for maintaining reporting documentation. Each fact of economic life is subject to registration by a primary accounting document. Distortion or falsification of accounting, management and other types of accounting data or supporting documents is not allowed.

## **7. MEASURES TO COUNTERACT AND PREVENT THE RISKS OF CORRUPTION**

### **7.1. Information and training**

In order to form an appropriate level of corporate culture with newly hired Employees/Officers of the Company, introductory training is conducted on the provisions of this Policy and related documents;

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Employees/Officials undergo training in person in the form of trainings, as well as in absentia or distance learning by familiarizing themselves with this Policy, which is publicly available on the Company's website and on internal resources.

## **7.2. Check of the Company's Counterparties and candidates for vacant positions of CEO-1, CEO-2**

Before making a decision on the commencement or continuation of business relations, when attracting candidates for vacant positions of CEO-1, CEO-2 or before extending employment relations with them, when interacting with Counterparties and other stakeholders, the Company checks their reliability, the absence of a Conflict of Interest, their relationship with Politically Exposed Persons, and analyses information about their reputation.

The procedure for checking candidates for vacant positions of CEO-1, CEO-2 or for extending employment relationships with them for compliance with the requirements established, including by this Policy, is carried out in accordance with the internal documents of the Company.

The procedure and criteria for checking Counterparties and recipients of charitable/sponsorship assistance are set out in the internal document on checking the reliability of the Company's Counterparties.

## **7.3. Accounting and auditing**

In order to provide stakeholders with complete and reliable information on the financial position, results of operations and changes in the financial position, the Company maintains accounting, tax and management records in full compliance with the requirements of applicable legislation, international financial reporting standards and internal regulatory documents of the Company.

All financial and economic transactions are reflected in accounting and other types of records based on the principles of completeness, reliability and openness, comparability, relevance and clarity.

The Company does not allow financial and economic transactions to be carried out without reflecting them in accounting records, or distorting or falsifying data from accounting, management and other types of accounting, or primary accounting documents.

All financial and economic transactions of the Company are subject to due review and approval by authorized Employees in accordance with the requirements of internal documents.

Financial statements undergo regular external audit in accordance with the requirements of legislation and the Company's internal documents, as well as periodic internal audit.

## **7.4. Incurring entertainment expenses and gift exchange**

In accordance with the legislation of the Republic of Kazakhstan, the Company

prohibits Officials and Employees, as well as family members of these persons, from receiving and offering material remuneration, gifts or services (hereinafter - Gift) provided for the actions (inactions) of this person in favour of the persons who provided the Gift or other third parties, if such actions (inactions) are within the official powers of this person or he/she, by virtue of his/her official position, can facilitate such actions (inactions).

Gifts received without the knowledge of the Officials and/or members of their families are subject to gratuitous transfer to the authorized body for state property management within seven calendar days from the date of receipt of the Gift or from the date when the Official or Employee became aware of the receipt of the Gift, and services rendered to the said persons under the same circumstances must be paid for by transferring money to the republican budget within seven calendar days from the date of rendering the service or from the date when the official became aware of the rendering of the service.

Gifts received by Employees are subject to submission to the Company's Compliance Service for further registration in the Company's gift register.

The implementation of entertainment expenses and exceptional cases of exchange of gifts is regulated by the KMG Code of Business Ethics.

#### **7.5. Restrictions on the implementation of charitable and sponsorship activities**

The Company does not directly provide charitable or sponsorship assistance to government agencies, commercial and non-profit organizations, their representatives, or other persons.

Charitable and sponsorship assistance may be provided in accordance with the internal documents of KMG and Samruk-Kazyna JSC.

#### **7.6. Refusal to participate in political activities**

The Company does not participate, directly or indirectly, in political parties, organizations and funds associated with them, including, does not make sponsorship and other payments in their support. At the same time, Employees and Officials have civil rights in their free time, to participate, at their own discretion, in political activities, if, at the same time, such participation does not harm the interests of the Company and does not create a Conflict of Interest.

#### **7.7. Accountability for committing corrupt acts**

The Company makes every reasonable and legal effort to ensure prompt and inevitable prosecution for corrupt actions and other violations of anti-corruption legislation and internal anti-corruption documents, regardless of the size and form of such violations.

The Company reserves the right, in accordance with the established procedure, to make information about persons held liable for committing corruption offenses established by this Policy public.

### **7.8. Waiver of retaliatory measures**

The Company guarantees that Employees/Officials who refused to commit a corrupt offence /corrupt act before it became known to the Company will not be subject to disciplinary action.

The Company considers it unacceptable and strives to promptly identify and suppress retaliatory measures, namely, actions aimed at discrimination, persecution or other negative consequences on the part of third parties towards Employees/Officials who have reported in good faith a suspected fact of a corruption offense committed by another Employee/Official, even if such suspicion is not confirmed.

### **7.9. Hotline**

In order to maintain a high level of trust in the Company, to comply with international standards of business ethics, as well as to prevent and suppress cases of Bribery and Corruption, the Company operates a “Hotline”.

By contacting the Hotline, any person may, in a form convenient for them, including on condition of anonymity, report facts of Bribery, Corruption and Commercial Bribery, Conflict of Interest that may lead or has led to Corruption, other manifestations of corruption and violations of the provisions of the Policy that have become known to them.

Each request is carefully considered, the results of the review of the request are communicated to the responsible persons of the Company, and if there are grounds for doing so, an appropriate check is carried out in accordance with the internal documents and procedures of the Company.

The contacts of the “Hotline” are posted on the official website of the Company on the Internet, on information boards and in other public places. Information is available 24 hours a day, without days off and holidays, except for temporary failures in the operation of the website.

### **7.10. Interaction with law enforcement agencies**

The Company undertakes to report to the relevant law enforcement authorities any corruption offenses that become known to the Company.

Interaction with law enforcement agencies on the part of Employees and Officials is possible in the following forms:

- informing law enforcement agencies about cases of violations that have signs of corruption and fraud;
- providing assistance to law enforcement agencies in taking measures to prevent or investigate corruption;
- providing responses/participation in meetings (conferences) at the request of law enforcement agencies on issues of preventing and combating corruption.

### **7.11. Anti-corruption restrictions. Financial control measures**

In order to prevent persons equated to persons authorized to perform state functions, as well as persons who are candidates for the said positions, from committing actions that



may lead to them using their powers for personal, group and other non-official interests, the said persons accept the anti-corruption restrictions established by the current legislation of the Republic of Kazakhstan on combating corruption.

The consent of the said persons to accept anti-corruption restrictions is recorded by the Human Resources Management Department in writing.

Failure to accept anti-corruption restrictions by the said persons shall result in refusal to hire them for a position or dismissal from a position; failure to comply with them in cases where there are no signs of a criminally punishable act or administrative offence shall be grounds for termination of the relevant activities.

Persons who are candidates for a position related to the performance of state or equivalent functions, as well as their spouses, submit a declaration of income and property, a declaration of assets and liabilities to the state revenue authority at their place of residence in accordance with the legislation of the Republic of Kazakhstan.

Failure to submit or submission of incomplete, inaccurate declarations and information, if the act does not contain elements of a criminally punishable act, shall be grounds for refusing to grant the person the relevant powers or shall entail liability provided for by the Code of the Republic of Kazakhstan on Administrative Offenses .

## **7.12. Organization of the anti-corruption system.**

7.12.1. KMG has created and maintains an anti-bribery management system (hereinafter - ABMS).

7.12.2. The KMG Board of Directors demonstrates its leadership position by:

- 1) approval of the Anti-Corruption Policy;
- 2) ensures consistency of the Anti-Corruption Policy with the goals and development strategy of KMG;
- 3) ensures the provision of sufficient and appropriate resources for the effective functioning of the anti-bribery management system;
- 4) exercises control over the development and implementation of the KMG anti-bribery management system, its effectiveness, as well as the sufficiency of allocated resources for its effective functioning;
- 5) periodically, but not less than once a year, receives information on the construction and functioning of the anti-bribery management system and on the measures taken in the area of combating corruption;
- 6) periodically, but not less than once a year, analyses the achievement of goals and the effectiveness of the anti-bribery management system.

7.12.3. KMG Management Board:

- 1) ensures the development, implementation, maintenance and revision of the anti-bribery management system;
- 2) takes the necessary measures for the effective functioning and continuous improvement of the anti-bribery management system and compliance functions;
- 3) provides sufficient and appropriate resources for the effective functioning of the anti-bribery management system;

4) ensures the promotion of a culture of compliance, anti-corruption and non-acceptance of corruption violations in KMG;

5) ensures that KMG employees are informed about the importance of effective anti-corruption measures and compliance with the requirements of the compliance system;

6) motivates employees to proactively provide information (Hotline);

7) guarantees that no employee will be subject to persecution, discrimination or disciplinary action for reporting in good faith or based on a reasonable assumption about corruption violations committed in the company, or for refusing to participate in corrupt activities, even if such refusal may lead to losses for KMG's business;

7.12.4. The anti-bribery management system includes measures on:

1) development and updating of internal regulatory anti-corruption documents, anti-corruption restrictions, maintaining records and storing evidence of the activities carried out;

2) conducting an internal analysis of corruption risks;

3) conducting anti-corruption monitoring;

4) verification of counterparties;

5) informing employees about the requirements of anti-corruption legislation and internal regulatory anti-corruption documents of KMG;

6) development of goals and activities to ensure the effectiveness of the anti-bribery management system;

7) development of tools for informing counterparties and third parties about current anti-corruption measures and restrictions in KMG;

8) conducting an internal audit of the anti-bribery management system, communicating its results to the Board of Directors and the Management Board of KMG;

9) working with appeals regarding anti-corruption violations or suspicions thereof;

10) formation of materials for the purpose of submission to the Board of Directors and the Management Board of KMG for analysis by management;

11) analysis of the effectiveness of the anti-bribery management system by the Compliance Service;

12) development of measures to improve the anti-bribery management system.

7.12.5. KMG coordinates the anti-corruption activities of subsidiaries and affiliates.

7.12.6. Through its representatives on the boards of directors/supervisory boards, KMG annually communicates its position on expectations regarding the anti-corruption measures, including the elimination of identified shortcomings, corruption risks, and factors contributing to the commission of corruption offenses in KMG's portfolio companies .

## **8. INTERACTION WITH POLITICALLY EXPOSED PERSONS AND THE PUBLIC**

The Company believes that any dialogue and interaction with Politically Exposed Persons should be based on a proactive, honest, transparent, responsible and consistent approach and comply with applicable laws and business ethics standards.

Any improper interaction of an Employee/Official with Politically Exposed Persons is strictly prohibited.

The Company refrains from any payments in favour of Politically Exposed Persons as well as their Close Relatives, spouses, In-Laws, members of their families or payments in the interests of the said persons, including receiving material or other benefits from the Company with the direct or indirect purpose of obtaining any undue advantages or preferences, including:

- organization or payment (compensation) for participation in entertainment events;
- organization or payment (compensation) for rest, treatment and disease prevention;
- organization or payment (compensation) of travel and other expenses.

In case of organization of an event with participation of Politically Exposed Persons at the expense of the Company, the initiator of such an event must obtain preliminary approval of this event from the authorized structural subdivision for the compliance function. In this case, entertainment expenses must not exceed the limits on entertainment expenses determined by Samruk-Kazyna JSC or the limits established by law.

Employees/Officials are prohibited from offering, transferring, promising, or assuring the transfer of funds, any other valuables, or material or other benefits to Politically Exposed Persons, directly or through intermediaries, in exchange for or with the purpose of obtaining undue advantages or preferences.


Employees/Officials are prohibited from offering, giving or promising any Incentive Payments to Politically Exposed Persons directly or through intermediaries.

Employees/Officials are required to avoid any behaviour that may be perceived by Politically Exposed Persons as a willingness to commit or facilitate corrupt acts. These requirements apply to all interactions, including oral and written communications, negotiations.

Employee/Official who has received information from Politically Exposed Persons that may be perceived as a request, demand, extortion, hint at the transfer of funds, any other valuables, material or other benefits in his/her favour or in favour of his/her Close Relatives, spouses, in-laws, members of their family is obliged to suspend business contacts with the relevant Politically Exposed Person and, within 1 (one) business day, notify the authorized structural subdivision for compliance functions of the existence of such a situation and/or send information about it to the Hotline.

Concluding contracts with Politically Exposed Persons, their Close Relatives, spouses, In-Laws, and members of their families is a factor of high corruption risk. To eliminate such risk, the Company checks potential Employees and Contractors for their connections with Politically exposed persons in accordance with internal documents.

In the event of any doubts about the legality or ethics of their actions, Employees/Officials are required to obtain advice from the authorized structural subdivision for the compliance function.

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## **9. ANALYSIS AND ASSESSMENT OF CORRUPTION RISKS**

The Company, in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents, conducts an internal analysis and assessment of corruption risks.

The purpose of the analysis and assessment of corruption risks is to identify the causes of corruption risks and develop measures to eliminate or minimize them.

Corruption risks are identified through anti-corruption monitoring and internal audit of the anti-bribery management system.

The results of the analysis and assessment of corruption risks are used to analyse the effectiveness of the anti-bribery management system.

The Company conducts anti-corruption monitoring in accordance with the legislation of the Republic of Kazakhstan and its internal regulatory documents.

The subject of anti-corruption monitoring is information concerning the effectiveness of anti-corruption policy, the state of law enforcement anti-corruption practice, as well as the perception and assessment of the level of corruption in the Company.

The results of anti-corruption monitoring are used to analyse corruption risks and assess the effectiveness of the anti-bribery management system.

## **10. LIABILITY FOR FAILURE TO IMPLEMENT (IMPROPER IMPLEMENTATION) OF THE POLICY**

Responsibility for compliance with the requirements of this Policy lies with each Employee/Official, regardless of the position held.

The commission of corruption offenses and/or fraudulent actions by an Employee/Official is recognized as a gross violation of labour duties.

Employee/Official is subject to liability regardless of status and position. Liability is imposed in accordance with the legislation of the Republic of Kazakhstan.

If it is detected and established the Employee/Official is involved in the commission of corruption offenses and/or fraudulent actions, the Company has the right to bring the Employee/Official to disciplinary responsibility, including in the form of termination of the contract in the manner established by the current legislation of the Republic of Kazakhstan.

If there are sufficient grounds, the materials of the internal investigation on the above facts are transferred to law enforcement agencies with a statement on bringing the guilty persons to administrative or criminal liability.

If harm or damage caused to the Company, the Company reserves the right to file a civil claim against the person who committed corruption offenses and/or fraudulent actions.

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The Chair of the Management Board/General Director of the Company bears disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan for failure to perform or improper performance of official duties to prevent the commission of corruption offenses by subordinate employees.

The Chair of the Management Board/ General Director of the Company bears disciplinary responsibility for the commission of corruption crimes by employees directly subordinate to him/her under the following conditions:

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

2) In relation to a subordinate employee, there is a court decision that has entered into legal force on bringing to criminal liability for a corruption crime, or a 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), 9), 10), 11) and 12) of part one of Article 35 or 36 of the Criminal Procedure Code of the Republic of Kazakhstan.

## **11. FINAL PROVISIONS**

In order to comply with international standards of business ethics, openness and transparency of business, Employees/Officials must notify the authorized structural subdivision for the compliance function on all cases of their inclination to commit corruption offenses, in accordance with the Company’s internal documents.

In case of doubts regarding the legality of the actions of other Employees/Officials or Counterparties, possible corrupt actions and other violations, bribery, commercial bribery, conflict of interest, etc., the Employee/Official, Counterparty, shareholder or other person may report their doubts to the authorized structural subdivision for the compliance function or contact the “Hotline” in the form of an open dialogue (including anonymously) in accordance with the procedure established by the internal documents of the Company.



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**Appendix No. 1  
to the Anti-Corruption Policy**

**COMMITMENT TO COMPLY WITH ANTI-CORRUPTION POLICY  
STANDARDS IN JSC NC KAZMUNAYGAS AND ITS SUBSIDIARIES AND  
AFFILIATES**

1. The Employee/(Person who has entered into a civil law contract with the Company) confirms that he/she has read the content of the Anti-Corruption Policy in the Company and the Code of Business Ethics of JSC NC KazMunayGas and shall comply with them.

2. The Employee (the Person who has entered into a civil law contract with the Company) shall:

2.1. Not participate in corrupt activities directly or indirectly, personally or through third parties, including not offer, give, promise, ask for or receive bribes and payments to simplify formalities in any form (Incentive Payments), including in the form of cash, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, government and local government bodies, Kazakhstan and foreign civil servants, private companies and their representatives.

2.2. Refrain from behaviour that may be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests of or on behalf of the Company.

2.3. Immediately inform the immediate supervisor and the person responsible for monitoring compliance with the Policy:

- on cases of an Employee corruption;
- on information that has become known to the Employee about cases of corruption offenses committed by other Employees, Contractors of the Company or other persons;
- on the possibility of the occurrence or the occurrence of a Conflict of Interest for the Employee.

3. The Employee has become familiar with the possibility of reporting about any suspicions regarding the legality or ethics of his/her actions, as well as the actions, inactions or proposals of other Employees, Counterparties or other persons who interact with the Company to the Company's "Hotline", the authorized structural subdivision for the compliance function responsible for monitoring compliance with the Policy.

4. The Employee has been explained that no Employee of the Company, including him/her, will be subject to sanctions or prosecution by the Company if he/she reported an alleged fact of corruption, or if he/she refused to give or receive a Bribe, commit Commercial Bribery or in any other way provide Mediation in bribery, including as a result of such refusal, the Company suffered lost profits or did not receive commercial and competitive advantages.

5. The Employee is warned about the possibility of being subject to disciplinary, administrative, civil and/or criminal liability for violating the anti-corruption requirements of Kazakhstan and other applicable legislation, as well as the Anti-Corruption Policy and the Code of Business Ethics of JSC NC KazMunayGas.

6. The employee was explained that if he/she has any additional questions about the principles and requirements of the Anti-Corruption Policy in JSC NC KazMunayGas and its subsidiaries and affiliates and applicable anti-corruption legislation, he can contact the authorized structural subdivision for the compliance function responsible for monitoring compliance with the Policy.

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**Appendix No. 2  
to the Anti-Corruption Policy**

**MEMO FOR EMPLOYEES OF JSC NC KAZMUNAYGAS ON  
COMPLIANCE WITH THE REQUIREMENTS OF ANTI-CORRUPTION  
LEGISLATION AND POLICY**

**1. What behaviour is prohibited?**

The Anti-Corruption Policy of JSC NC KazMunayGas (hereinafter - KMG) in KMG and its subsidiaries and affiliates (hereinafter - the Policy) prohibits any forms of corruption: abuse of official position, giving a bribe (active bribery), receiving a bribe (passive bribery), mediation, abuse of authority, commercial bribery or other illegal use of his/her official position by an individual contrary to the interests of KMG and the state, to obtain a benefit in the form of money, valuables, other property or services of a property nature, other property rights for himself/herself or third parties, or the illegal provision of such a benefit to the said person by other individuals, as well as the commission of the said acts on behalf of or in the interests of a legal entity.

**2. What is a Bribe?**

A bribe is the acceptance of material values (items or money) or any property benefit or services for an action (or, conversely, inaction) in the interests of the bribe giver, which this person could or should have committed by virtue of his/her official position.

A bribe can be something of value, including a financial or other advantage. Examples of bribes include (but are not limited to):

- financial payments or promises of payments in cash or cash equivalents (e.g., gift certificates),
- gifts, entertainment and hospitality (e.g., travel, meals and accommodation),
- services,
- loans and collateral,
- property or any share in property of any kind,
- protection from penalties and release from any obligation,
- anything given for an inappropriate reward,
- provision of internship, work experience or offer of temporary or permanent employment (including provision of the same services/benefits to Close Relatives, spouses, In-Laws ),
- political or charitable contributions.

**It shall not be a defence to bribery that the bribe is a necessary measure in any local industry, business, profession or vocation.**

### **3. Active bribery**

It is always unacceptable for Employees/Officials to:

- offer, promise or pay bribes, including Facilitation Payments, other unlawful payments or advantages to or for the benefit of, or at the direction of, a Politically Exposed Person;

- promote, facilitate, assist or support such behaviour.

A violation of the Policy occurs if KMG Employee/Official offers, attempts to pay, pays, or acts as an intermediary in the payment of a bribe to a Politically Exposed Person, even if the KMG Employee/Official does not receive a benefit in return.

### **4. Passive bribery**

Employees/Officials are prohibited from:

- asking for, demanding, agreeing to receive or accept a bribe from a Politically Exposed Person.

This prohibition applies regardless of whether the Employee receives a bribe for his/her own benefit or on behalf of another person.

The Policy is violated if KMG Employee/Official asks for or demands a bribe; the bribe may not actually be paid.

### **5. What is Commercial Bribery?**

Commercial bribery is the illegal transfer of money, securities or other property to a person performing managerial functions in a commercial or other organization, as well as the illegal provision of property services to him/her in exchange for his/her use of his/her official position, as well as general patronage or permissive attitude in service in the interests of the person committing the bribery.

### **6. When is an advantage considered a Bribe or Commercial Bribery?**

Giving an advantage is a Bribe, regardless of value, if there is an intent to:

- encourage or promote improper conduct on the part of the recipient or another person (Commercial Bribery); or

- influence a Politically Exposed Person (illegally or otherwise) in the performance of his/her official duties in order to obtain or retain a commercial advantage.

Giving the advantage is likely to be a Bribe if:

- it is illegal under the relevant anti-corruption and bribery laws;
- it creates an obligation or the appearance of an obligation for the other party;
- it is intended to induce a person to act or refrain from acting with the aim of providing a particular benefit or general support to the person providing the benefit or to the organization of such person;

- it is provided to a Politically Exposed Person to influence an employee with respect to his/her official duties, to expedite the performance of official duties, or to obtain general support from such person;

- it is unreasonable in terms of cost, frequency or method of delivery.

## **7. What else is prohibited?**

The following is also unacceptable for you:

- to violate financial discipline, including criminal acts such as theft of funds and making false statements, insider trading, money laundering or misappropriation of funds;
- to use or offer privately to others access to or use of KMG's resources, including assets, funds or intellectual property, without prior permission from KMG;
- to attempt to induce an individual employee of a commercial organization, a state (in whole or in part) organization, or a Politically Exposed Person to commit illegal actions;
- to offer, give or permit Bribes/Commercial Bribery, directly or indirectly, through an agent or associated person:
  - a . a. Politically exposed person, or
  - b. a manager, officer or employee of a commercial or other organization;
- to offer or provide an unauthorized benefit (property or other) to an employee of any competitor, supplier or customer of KMG, which may lead to unfair competitive advantage and violation of applicable competition regulations, such as any benefit that may lead to an improper advantage of KMG over its competitors;
- to use any connections that you may have with Politically Exposed Persons for the purpose of illegally gaining a competitive advantage over KMG;
- to fail to report evidence of illegal payments or favours in accordance with the Policy or any circumstances that give reason to suspect such behaviour;
- to take action, including fraudulent false statements, to induce a party to obtain a financial or other benefit or to evade an obligation;
- to attempt to conceal or hide any of the above.

I have read the memo, everything was read and explained in full.

FULL NAME \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_



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## **Appendix No. 3 to the Anti-Corruption Policy**

### **Example of an Anti-Corruption Clause for Contracts with Counterparties**

1. [Name of contractual partner] shall ensure that all individuals and entities affiliated with it acting under this Contract (each, an “Affiliate”), including without limitation the owners, directors, officers, employees and agents of [Name of contractual partner], comply with the warranties of this clause.

2. [Name of contractual partner] and all Affiliates shall not directly or indirectly commit the following actions:

2.2.1. To pay, offer, promise or allow to pay any money or provide other valuables (including gifts, entertainment and subsidies) to any persons associated with the state for the purpose of illegally obtaining, maintaining or conducting business or obtaining illegal benefits for KMG.

2.2.2. Not to commit other actions that violate applicable laws prohibiting bribery in the commercial sphere, including commercial bribery and other illegal and unlawful means of doing business.

3. [Name of contractual partner] [is not] <sup>1</sup>a state-related entity and [does not have] <sup>2</sup>Politically Exposed Persons who are its officials, employees or direct or indirect owners. [Name of contractual partner] shall promptly inform KMG in writing of all cases in which any Politically Exposed Person becomes an official or employee of [Name of contractual partner] or acquires a direct or indirect shareholding in [Name of contractual partner].

4. [Name of the counterparty under the contract] was created for the purpose of carrying out legitimate business activities, and not for any illegal purposes, and has only legal sources of financing.

5. [Name of contractual partner] and its Affiliates have not been convicted of or found guilty of any unlawful acts involving fraud or corruption. [Name of contractual partner] shall promptly inform KMG in writing if [Name of contractual partner] or any of its Affiliates are convicted of or found guilty of any such unlawful acts.

6. [Name of contractual partner] confirms that it has read the Code of Business Ethics of JSC NC KazMunayGas (hereinafter - KMG) and the Anti-Corruption Policy of KMG and its subsidiaries and affiliates on the official KMG website. [Name of contractual partner] certifies that it fully understands the Code of Business Ethics of KMG and the Anti-Corruption Policy of KMG and its subsidiaries and affiliates.

7. [Name of contractual partner] shall provide KMG with assistance and support in good faith in the event of an actual or potential violation of the requirements of this Anti-Corruption Clause, including the obligation to ensure the possibility of conducting a survey of its owners, directors, officers and other Affiliates.

<sup>1</sup>The text must be changed if the Counterparty is a person associated with the state

<sup>2</sup>If available, it is necessary to change the text and obtain a list of public officials

8. [Name of contractual partner] shall promptly notify KMG of all cases of violation of the requirements of the anti-corruption clause related to KMG's activities. To report cases of violation of the requirements, [Name of contractual partner] is obliged to use the KMG “Hotline”, information about which is posted on the official KMG website.



**Appendix No. 4  
to the Anti-Corruption Policy**

**Consent to the anti-corruption restrictions and prohibitions**

I, (full name) \_\_\_\_\_, accept anti-corruption restrictions and prohibitions in accordance with the Law of the Republic of Kazakhstan “On Anti-Corruption” for:

- 1) inadmissibility of joint service (work) of close relatives, spouses and in-laws;
- 2) carrying out activities that are incompatible with the performance of official duties in KMG and its subsidiaries and affiliates;
- 3) the use of official and other information not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
- 4) accepting material rewards, gifts or services for actions (inactions) in favour of the persons who provided them, if such actions are within my official powers, or I, by virtue of my official position, can facilitate such actions (inactions);
- 5) participation in gambling and (or) betting in gambling establishments that fall under the definition provided for by the Law of the Republic of Kazakhstan “On Gambling Business”, as well as participation in gambling and (or) betting in places not designated for this purpose or in gambling and (or) betting conducted through the use of telecommunications networks, including the Internet;
- 6) the inadmissibility of independent participation in the management of a business entity, if management or participation in the management of a business entity is not included in official duties in accordance with the legislation of the Republic of Kazakhstan, assistance in satisfying the material interests of organizations or individuals through the unlawful use of their official powers for the purpose of obtaining property or other benefits;
- 7) not to engage in any other paid activity except teaching, scientific and other creative activities.

I am aware of the liability established by the current legislation of the Republic of Kazakhstan for failure to comply with the restrictions and prohibitions established by the anti-corruption legislation of the Republic of Kazakhstan.

FULL NAME \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

**Approval sheet for the KazMunayGas Group Anti-Corruption Policy**

<b>Position</b>	<b>Signature, date</b>	<b>Full name</b>
First Deputy CEO	No. 47/10990-SZ dated 30.09.2024	K. Iskaziyeu
Deputy CEO	No. 47/10990-SZ dated 30.09.2024	D. Abdulgafarov
Deputy CEO	No. 47/10990-SZ dated 30.09.2024	D. Arysova
Deputy CEO	No. 47/10990-SZ dated 30.09.2024	R. Balykbayev
Deputy CEO	No. 47/10990-SZ dated 30.09.2024	S. Brekeshev
Deputy CEO	No. 47/10990-SZ dated 30.09.2024	B. Zakirov
Deputy CEO	No. 47/10990-SZ dated 30.09.2024	A. Magauov
Deputy CEO	No. 47/10990-SZ dated 30.09.2024	B. Abayildanov
Deputy CEO	No. 47/10990-SZ dated 30.09.2024	V. Lavrenov
Chief Administrative Officer	No. 47/10990-SZ dated 30.09.2024	A. Kuttymurat-uly
Digital Development Director	No. 47/10990-SZ dated 30.09.2024	G. Bezhentayev
HSE Director	No. 47/10990-SZ dated 30.09.2024	K. Seitmagambetov