

		Limited Liability Partnership "National Marine Shipping Company "Kazmortransflot"	
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Developed by: Compliance Officer Murzakhanov E.S. _____ " " _____ 20__ г.		Reviewed by: Compliance Officer Murzakhanov E.S. _____ " " _____ 20__ г.	
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1. ABBREVIATIONS AND DEFINITIONS

1.1.ABBREVIATIONS

KMTF	National Maritime Shipping Company Kazmortransflot Limited Liability Partnership
RK	Republic of Kazakhstan

1.2.DEFINITIONS

External independent organization ("Hotline")	an external independent confidential reporting organization that receives reports on potential or ongoing violations of anti-corruption laws, as well as on other issues stipulated by this Policy.
Officials	employees who, by virtue of a law, other legal act or internal document of KMTF, are authorized to act on behalf of KMTF. Members of the KMTF Supervisory Board and the KMTF Management Board
Conflict of interest	any situation or circumstances in which the personal benefit or activity of an Employee or an official is contrary to the interests of KMTF or may potentially come into conflict with them and thus may lead to improper fulfillment of their official duties and affect the objectivity of decisions on issues related to KMTF.
Counterparty	A natural or legal person with whom the KMTF has concluded or plans to conclude a contract/agreement.
Corruption	illegal use by persons holding a responsible public position, persons authorized to perform public functions, persons equivalent to persons authorized to perform public functions, officials of their official (service) powers and related opportunities in order to obtain or extract, 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.
Public reporting	information on KMTF's activities available to the general public (<i>financial statements, annual reports</i>).
Employee	a person in an employment relationship with KMTF, as well as other persons engaged under contract through agencies and civil law contracts.

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Subject	KMTF employee against or in respect of whom the report/information/complaint has been filed
Third party	customers, suppliers, contractors, subcontractors and other persons counterparties of the KMTF

2. GENERAL PROVISIONS

2.1. This KMTF Proactive Whistleblowing Policy (hereinafter referred to as the Policy) defines the procedure for filing information (*report, statement, complaint*) about violations at KMTF.

2.2. The purpose of this Policy is to prevent and counteract conflicts of interest, fraud, manifestations of corruption, including abuse of official position, as well as unethical behavior.

3. SCOPE OF ACTION

3.1. The provisions of this Policy apply to all KMTF employees to the same extent, regardless of their position. Each KMTF employee undertakes to familiarize himself/herself with and follow the provisions and requirements of this Policy.

3.2. Employees are obliged to report to the Hotline any involvement or suspicion of involvement of KMTF, its Employees or Counterparties in corrupt behavior, fraud or other illegal actions.

3.3. Representatives of KMTF's Counterparties have the right to report to the Hotline facts of involvement or suspicion of involvement of KMTF and its Employees or Counterparties in corrupt behavior, fraud or other illegal actions.

3.4. The person responsible for the implementation of the Compliance Function ensures the operation of the Hotline and is responsible for conducting and coordinating actions to receive, process and respond to incoming reports.

3.5. In accordance with the KMTF Code of Business Ethics, information on facts of violation of the provisions of the KMTF Code of Business Ethics shall be reported by KMTF Employees to the Hotline, including but not limited to information on bribery, corruption, conflict of interest, violations of requirements, violations of accounting and financial reporting requirements, fraud (*including, but not limited to, abuse of authority, embezzlement or misappropriation, causing property damage to KMTF*), unfair competition, violations of hospitality and gift requirements.

3.6. Reports of discrimination on any grounds, labor disputes and other employment matters should be made to the KMG Ombudsman, who will review all reports in accordance with KMG's internal procedures and Code of Conduct.

3.7. Reports received under the Administrative Procedure Code of the Republic of Kazakhstan are not covered by this Policy and are handled in accordance with existing internal KMTF documents.

3.8. Information about facts that may lead to criminal liability is not considered. A person who has expressed a credible concern should be informed of the need to contact the authorized state bodies. If it is not possible to inform the person about the need to contact the authorized state bodies, the information shall be transferred to the structural unit for

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information and corporate security for further consideration and transfer to the authorized state bodies.

4. RESPONSIBILITY

4.1. The person responsible for the implementation of the compliance function shall be responsible for:

- 4.1.1. updating this Policy;
- 4.1.2. familiarizing new employees with the provisions of this Policy.

5. PROCEDURE OF INFORMING

5.1. Employees and other persons, in case they become aware of non-compliance with anti-corruption laws and internal documents, shall inform about it as soon as possible in accordance with the procedure stipulated in clause 5.2 of this Policy.

At the same time, Employees shall ensure that the information disclosed is accurate and that such disclosure is made in good faith. However, Employees or third parties are not required to conduct any investigation of non-compliance with anti-corruption laws or internal KMTF documents.

5.2. Employees and others may, at their discretion, report their concerns about a potential violation:

5.2.1. Employees may contact their immediate supervisor. In this case, the communication shall be made in person or in writing. If the reporting is in writing, it is preferable to provide the background and chronology of the Employee's concern and the reasons for the concern.

5.2.2. Employees may contact the Chief Executive Officer (Chairman of the Board) if the matter in question is relevant to the immediate supervisor or if the Employee prefers not to discuss the matter with the immediate supervisor. It is also preferred that the issue and the reasons for the concern be clearly stated in writing.

5.2.3. When a person approaches the General Director (Chairman of the Management Board) for assistance in combating corruption, subject to non-disclosure, warns the General Director (Chairman of the Management Board) of his/her intention to provide assistance in combating corruption after entering into a non-disclosure agreement.

The General Director (Chairman of the Management Board), not later than twenty-four hours from the moment of the request, shall conclude a non-disclosure agreement with the person specified in part one of this clause in the form according to Appendix No. 1 to this Policy.

5.2.4. The immediate/supervising managers or the General Director (Chairman of the Management Board):

- 1) receive reports of possible violations;
- 2) ensure that their employees are aware of this Policy and the established procedure;
- 3) encourage an open work environment for Employees who can easily raise concerns;
- 4) deal with the report appropriately;
- 5) consider providing guidance to the person who raised the concern or deal with the matter personally;

- 6) consider the need for an investigation;
- 7) resolve the concern, if possible;
- 8) if the matter cannot be resolved, refer it to the person responsible for implementing the compliance function and.

5.2.5. Employees may contact the person in charge of the compliance function.

In addition to reporting to the immediate/supervising manager or the CEO (Chairman of the Board), if an Employee prefers not to discuss a matter of concern, the Employee may contact the Compliance Officer in writing. Employees are encouraged to include the information in the communication in accordance with Appendix #2 to this Policy.

5.3. Employees and other individuals may contact the External Independent Organization on a confidential and anonymous basis. Hotline contacts are posted on the official KMTF website.

All messages transmitted through the Hotline communication channels are processed by the person responsible for the implementation of the compliance function.

Information may be reported in the state, Russian, English languages.

Information may be reported to the Hotline in anonymous form. However, in case of anonymous reporting it is difficult to respond properly, as it may be necessary to obtain additional information or disclose the information provided by the Applicant. The availability of the Complainant's details and the opportunity to communicate with the Complainant allows for a more thorough and effective review of the report. KMTF encourages Complainants to provide their names, contact information to assist in further investigation and to keep Complainants informed of progress.

KMTF will not attempt to compromise the anonymity of a Complainant, except where disclosure of the Complainant's anonymity is required by applicable law.

The external independent organization will refer all reports received to the Compliance Officer on the basis of confidentiality or, if the Applicant wishes to remain anonymous, on the basis of anonymity.

5.4. The person responsible for the implementation of the Compliance Function shall consider all reports received by the responsible person and/or the Hotline, regardless of the manner and form in which the information is communicated.

5.5. All received messages are reflected by the responsible person for the implementation of the compliance function in the unified information system of the compliance function of the group of JSC "Sovereign Wealth Fund "Samruk-Kazyna".

5.6. Upon receipt of a report, the person responsible for the implementation of the compliance function shall conduct a preliminary check with respect to the received reports of violations in the following order:

5.6.1. Compliance of the nature of the violation report is established. If the information is a report of facts specified in paragraph 3.6 of this Policy, the person responsible for the implementation of the Compliance Function shall transfer the report to the KMG Ombudsman within 24 hours of receipt of the information and inform the Applicant of such transfer.

5.6.2. If the information is not the information specified in paragraphs 3.5 and 3.6 of this Policy, as well as is not information about any violation of the legislation of the Republic of Kazakhstan, other applicable legislation or internal documents of KMTF, the person responsible for the implementation of the compliance function reserves the right not to respond to the received message. In such a case, the received materials are documented and a note is made about non-response to the received information.

5.6.3. The significance of the violation report, the reliability of the received information, as well as the degree of confidence in the source of information are assessed. If the significance, reliability of the received information or the possibility of trusting the Applicant is not confirmed, the received materials shall be documented and a note of non-response to the received information shall be made.

5.6.4. If a decision is made to respond to the information received, the communication is reviewed in accordance with the internal documents of KMTF. The purpose of reviewing the received information is to confirm the reliability of information about a potential or committed offense and, if necessary, to take appropriate measures based on the results of an internal investigation.

5.7. If, based on the results of preliminary verification of the arguments set forth in the report, there are signs of a criminal or administrative offense:

5.7.1. the materials of the verification shall be sent to the General Director (Chairman of the Management Board) of KMTF for making a decision on further referral of the materials to the authorized law enforcement bodies by competence in accordance with the requirements of the legislation;

5.7.2. if the report concerns the General Director (Chairman of the Management Board) of KMTF, the materials of the audit shall be forwarded to the structural unit for information and corporate security issues and KMG Compliance Service for consideration of the issue of forwarding the materials to the authorized law enforcement authorities in accordance with the requirements of the legislation.

5.8. The actions specified in clause 5.6 of this Policy shall be carried out for each report / suspected violation as soon as possible, but not more than within 72 working hours from the moment of receipt of information.

5.9. The person responsible for the implementation of the Compliance Function shall immediately inform the CEO (Chairman of the Management Board) of any reports that:

5.9.1. are related or suspected to be related to significant fraud or other illegal activities that may affect KMTF's ability to conduct business;

5.9.2. are related to, or are reasonably believed to be related to, a material or widespread finding of inadequate internal controls or an inefficiency in a material process;

5.9.3. could reasonably be expected to materially harm KMTF's reputation if the facts were publicized, or could reasonably be expected to result in material inconsistencies with KMTF's public reporting, or could reasonably be expected to require the amendment or restatement of KMTF's public reporting.

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5.10. If there is a contact for feedback, the person responsible for the compliance function will inform the Compliance function of receipt of the report within 72 business hours by written response, regardless of the method of receipt.

6.SAFEGUARDS AGAINST HARASSMENT

6.1 The person responsible for the implementation of the compliance function, as well as other employees involved in the review of reports, shall use the information transmitted to the Hotline within the scope of their job duties.

6.2 The KMTF shall protect the Complainant who has sent a violation report from any negative manifestations or actions of KMTF employees or representatives of KMTF Counterparties caused by such Complainant's sending a violation report.

6.2 Pressure and harassment of an employee or third party whistleblower shall not be tolerated and shall be considered a serious disciplinary offense, even if the facts alleged in the report are not substantiated. Employees shall be afforded full protection of their rights and interests, including retention of their job.

6.3 Employees shall be afforded full protection of their rights and interests, including retention of their job. However, employees who act in bad faith or make allegations for personal gain and/or with malicious intent may be subject to disciplinary action.

7.MONITORING AND TRAINING

7.1 KMTF welcomes Employees who are willing to openly discuss the Policy and looks favorably upon any constructive suggestions for improvement.

7.2 The KMTF Supervisory Board shall review the requirements of the Policy on a regular basis (*as needed or every two years*) for the purpose of updating and improvement and, if necessary, amend and/or supplement the Policy.

7.3. The Policy shall be understandable and accessible to each Employee. In accordance with the rules of competitive selection for vacant positions and adaptation of KMTF personnel, all new Employees are required to familiarize themselves with this Policy as part of the adaptation period.

7.4 In order to raise awareness of the Hotline among Employees, the person responsible for the implementation of the Compliance Function shall regularly send out a newsletter to KMTF Employees and post the information on the KMTF website.

8. REPORTING

8.1. The Compliance Officer shall, as part of periodic reporting, report to the Supervisory Board of KMTF on the status of investigations into reports received. The information shall contain:

8.1.1. the number of reports received;

8.1.2. the number of relevant reports (*accepted for investigation, for which there are some specific facts or preliminary information*) that have been investigated;

8.1.3. information on whether the message was confirmed or not (in case of partial confirmation (*if part of the message was confirmed*), it is necessary to indicate that it was confirmed);

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8.1.4. information on disciplinary and/or corrective measures taken (*with indication of due dates and priority*);

8.1.5. sphere of activity in which the violation was committed (*procurement, labor conflicts, conflict of interest, fraud, etc.*).

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Appendix No. 1 Form

Agreement on non-disclosure of information on assistance in combating corruption

_____ "___" _____ 20__ year
(locality)

NMSC "Kazmortransflot" LLP (hereinafter - KMTF), represented by _____,

(position, surname, name, patronymic (if any))

acting on the basis of the KMTF Charter, on the one hand, hereinafter referred to as "Manager", and _____

(surname, first name, patronymic (if any) of the employee of the companies)

on the other hand, hereinafter referred to as "Employee", hereinafter jointly referred to as "Parties", in pursuance of the provisions of [subparagraph 26\) of paragraph 1 of Article 22](#) and [subparagraph 29\) of paragraph 2 of Article 23 of the Labor Code of the Republic of Kazakhstan](#), [paragraphs 1, 2 and 4 of Article 24](#), [subparagraph 2\) of Article 24-1](#) and [paragraph 2 of Article 24-3](#) of the Law of the Republic of Kazakhstan "On Combating Corruption" have concluded this Agreement on the following:

Subject of the agreement

1.1 By this Agreement, the Parties guarantee non-disclosure of information about the Employee's application to the Manager to report _____.

(essence of the corruption offense)

KMTF or _____
(essence of other assistance rendered in combating corruption)

to the KMTF (hereinafter referred to as confidential information), except as provided for in Clauses 2.1. and 2.2. of this Agreement.

Obligations of the Parties

2.1 The Employee undertakes to:

1) after the conclusion of this Agreement, to immediately inform the Manager of the information that has become known to him/her about a corruption offense being prepared,

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committed or committed in KMTF, where he/she works, and (or) information aimed at providing other assistance in combating corruption in KMTF;

2) not to report knowingly false information about a corruption offense to the Head;

3) not to disclose confidential information to other persons, except for:

- officials of authorized state bodies and courts involved in the proceedings on a corruption offense reported by the Employee or otherwise assisted by the Employee in this case;

- officials of the relevant authorized state body and the authorized anti-corruption body involved in the payment of a lump-sum monetary remuneration to the Employee;

4) in case of application to the conciliation commission of the KMTF for consideration of an individual labor dispute within three years from the date of receipt by the authorized state bodies of the Employee's report on the fact of corruption offense or from the date of other assistance in combating corruption, specified in paragraph 1.1. of this Agreement, notify the Head of the forthcoming consideration of an individual labor dispute by the conciliation commission not later than three working days prior to the day of submission of the application to the conciliation commission;

5) not to use the information about the corruption offense that has become known to him/her in his/her personal interests or in the interests of third parties;

6) ensure the safety of this Agreement;

7) in case of an attempt by unauthorized persons to obtain confidential information or other information related to the Employee's assistance in combating corruption, immediately notify the Manager with whom the agreement on non-disclosure of confidential information has been concluded.

2.2 The Supervisor undertakes to:

1) not to require the Employee to provide information not related to the corruption offense being prepared, committed or committed;

2) to immediately transfer information about a corruption offense being prepared, committed or committed, and (or) information aimed at providing other assistance in combating corruption, received from the Employee, to the authorized state body, provided that an agreement on non-disclosure of confidential information is concluded with an official of the authorized state body;

3) not to disclose confidential information to other persons, except for:

- officials of the authorized state bodies and courts involved in the proceedings on the case of corruption offense reported by the Employee or otherwise assisted by the Employee in this case;

- members of the conciliation commission or disciplinary commission of the KMTF in cases provided for in subparagraphs 4) and 5) of this paragraph;

- officials of the authorized anti-corruption body invited to a meeting of the conciliation commission of the KMTF.

4) in case the conciliation commission of KMTF considers an individual labor dispute to which the Employee is a party, within three years from the date of receipt by the authorized state bodies of the Employee's report on the fact of a corruption offense or from

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the date of other assistance in combating corruption specified in paragraph 1.1. of this Agreement, notify the members of the conciliation commission of the existence of this Agreement no later than the day of the Employee's application to the conciliation commission;

5) ensure that an official of the authorized anti-corruption body invited to the meeting of the conciliation commission of the KMTF signs an agreement on non-disclosure of confidential information.

6) not to use information about a corruption offense being prepared, committed or committed and (or) information aimed at providing other assistance in combating corruption, received from the Employee, in personal interests or interests of third parties;

7) ensure the safekeeping of this Agreement;

8) in case of an attempt by unauthorized persons to obtain confidential information or other information related to the Employee's assistance in combating corruption, immediately notify the authorized state body with which an agreement on non-disclosure of confidential information has been concluded.

Final provisions

3.1 By signing this Agreement, the Employee and the Manager confirm that they are warned that they will be held criminally liable for disclosure of confidential information in accordance with the applicable laws of the Republic of Kazakhstan.

3.2 This Agreement shall come into force from the moment of its signing by the Parties and shall be valid during the term of the labor contract between the Employee and KMTF, and after termination of the labor contract - indefinitely.

3.3 This Agreement is drawn up in two copies in the state and Russian languages, having equal legal force, one copy for each of the Parties.

Addresses, details and signatures of the Parties

Head:

Name of the organization

BIN _____

Legal address _____

Contact phone number _____

Должность: _____

_____/_____

(signature) (surname, initials)

Employee:

Surname, first name, patronymic (if available)

Identification document No.

dated " __ " _____. _____. issued

IIN

Address of residence



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Contact phone number

(signature) / (surname, initials)

A copy of this Agreement has been received by (a): _____
/

(surname, initials) (signature)

Date: " ____ " _____ 20 ____

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Appendix No. 2

List of information that is recommended to be reflected in the communication

- Contact information (to be indicated at the discretion of the Applicant):
 - surname, first name, patronymic; - Applicant's status (KMTF Employee or representative of KMTF Counterparty, third party);
 - contact information (phone number, e-mail address)
 - Subject of the communication (e.g. corruption, bribery, fraud, conflict of interest)
 - Report of the violation and details: what, when, where and how the described offense or planned offense occurred, who committed the violation, how the violation relates to KMTF, and any other information necessary to review the report.
- Additional questions:
 - Would you like us to contact you? (If yes, you must provide contact information)
 - Would you like to be informed of the outcome of your communication?
 - Would you be able to provide documents or other materials confirming the facts stated in the report of violation?