

	Limited Liability Partnership "National Marine Shipping Company "Kazmortransflot".	
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1. PURPOSE OF THE DOCUMENT AND GENERAL PROVISIONS

1.1. This Anti-corruption Policy of "NMSC "Kazmortransflot" LLP and its subsidiaries (hereinafter - the Policy) is developed in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption", other legislative acts of the Republic of Kazakhstan in the field of combating acts of corruption, internal regulatory documents of "NMC "Kazmortransflot" LLP.

1.2. NMSC Kazmortransflot LLP (hereinafter - KMTF) is convinced that one of the most important conditions for sustainable business development is strict compliance with the legislation governing relations in the field of combating corruption.

1.3. KMTF declares its categorical rejection of dishonest and illegal ways of doing business and voluntarily assumes additional obligations in the field of prevention and avoidance of corruption recommended by Kazakhstani, foreign and international bodies and organizations.

1.4. The Policy discloses the goals and objectives of KMTF in the field of combating involvement in corrupt activities, defines the legal basis and key principles of this counteraction, describes the measures taken by KMTF to prevent corruption, establishes the obligations of Employees and other persons in the field of combating corruption, as well as responsibility for non-fulfillment (improper fulfillment) of the provisions of the Policy.

1.5 This Policy has been developed in order to:

1.5.1. ensuring compliance of KMTF's activities with the requirements of Kazakhstani legislation and other law of the country of incorporation of KMTF Sub., as well as international treaties ratified by both the Republic of Kazakhstan and the country of incorporation of Sub. regulating relations in the field of prevention and combating corruption, high standards of ethical business conduct;

1.5.2. minimizing the risks of involvement of KMTF and its Employees in corrupt activities;

1.5.3. formation of a unified view of KMTF as denying corruption in any of its forms and manifestations among the employees and officials of KMTF, the Sole Participant, investors, Counterparties, representatives of state authorities, other interested parties;

1.5.4. creation of a local regulatory framework governing KMTF's activities to counteract involvement in corruption.

1.6 The objectives of this Policy are:

1.6.1. defining the goals, objectives and principles of KMTF in the field of combating corruption and fraud;

1.6.2. prevention, detection, suppression and disclosure of unlawful acts, as well as identification and identification of persons preparing, committing or perpetrating them;

1.6.3. identification of major corruption and fraud risks and determination of measures to minimize and/or eliminate them;

1.6.4. formation of KMTF's corporate culture to counter corruption and fraud;

1.6.5. implementation of anti-corruption procedures in KMTF based on applicable anti-corruption legislation and communicating them to KMTF Employees and other stakeholders;

1.6.6. establishing the obligation of KMTF Employees and Officials to comply with the principles, restrictions and requirements set forth in the Policy;

1.6.7. providing information channels for reporting facts of corruption;

1.6.8. explaining the measures taken by KMTF to prevent corruption.

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1.7. This Policy emphasizes KMTF's commitment to high ethical standards of business conduct and the maintenance of its business reputation. KMTF recognizes that its reputation for honesty and integrity is one of its most valuable assets, believing that corruption poses a threat to its business and values. KMTF's firm stance against corruption is a fundamental business principle.

1.8. KMTF prohibits Employees and Officers from committing corruption offenses or bribery in any form, whether directly or through the involvement of third parties (Intermediation), worldwide, KMTF openly declares its rejection of corruption and voluntarily makes additional commitments to prevent corruption offenses.

1.9. KMTF expressly prohibits KMTF Employees and Officers from making Incentive Payments to Politically Exposed Persons on behalf of KMTF or its Sub., including payments of such payments through intermediaries.

1.10. This Policy shall be posted on KMTF's official website and distributed on the Internet and in the electronic document management system.

2. SCOPE OF APPLICATION

2.1. The Policy is binding on all employees and Officers of KMTF.

2.2. The Policy applies to:

2.2.1. KMTF;

2.2.2. KMTF subsidiaries.

2.3. If the internal normative documents of Sub. or the legislation of the countries of location of Sub. establish stricter requirements than the provisions of the Policy, the provisions of the internal normative documents of Sub. or the legislation of the country of incorporation of such Sub. shall apply. In this case, the relations not covered by the internal documents of the Sub. or the legislation of the Sub.'s incorporation shall be subject to the provisions of the Policy.

2.4. Restrictions and prohibitions established by the legislation of the Republic of Kazakhstan on combating corruption apply to the citizens of the Republic of Kazakhstan appointed to Sub. registered in foreign countries.

2.5. KMTF recommends its Counterparties to strictly adhere to the requirements of this Policy and ensure compliance with the requirements of the Policy by their employees.

2.6. Application of the Policy in Sub. can be carried out by developing and approving similar policies or bringing internal documents of Sub. in compliance with this Policy, taking into account the specifics and peculiarities of Sub.' activities. At the same time, the requirements stipulated by this Policy in similar policies and internal documents of Sub. shall not be reduced.

3. DEFINITIONS AND ABBREVIATIONS

Active Bribery	Offering, promising, authorizing or paying bribes (directly or indirectly), or aiding or abetting such conduct
Close relatives	parents (parent), children, adoptive parents (adoptive parents), adopted children, full and half brothers and sisters, grandparents, grandchildren.

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Bribe¹	1) material values (objects or money) or any property benefit or service for an action (or, conversely, inaction) in the interests of the bribe-giver or other third party in favor of a Politically Exposed Person, which this Politically Exposed Person could or should have done by virtue of his/her official position; 2) material valuables (objects or money) or any property benefit or favor for an action (or, conversely, inaction), in the interests of the bribe-giver or another third party in favor of the Employee or Official
Fund	Samruk-Kazyna JSC
Hotline	communication channels: "KMTF Hotline: Helpline: +7 (7292) 535 823 E-mail: doverie@kmtf.kz Centralized "Hotline": Phone: 8 800 080 47 47 (The call is free within the RK) WhatsApp: 8 771 191 88 16 Internet portal: www.sk-hotline.kz E-mail: mail@sk-hotline.kz
Official	person performing managerial functions in KMTF , a person permanently, temporarily or by special authority ² performing organizational, managerial or administrative functions in KMTF, KMTF Sub.
Sub	KMTF subsidiaries
KMG	NC KazMunayGas JSC
Stakeholders	Individuals, legal entities, groups of individuals or legal entities that are or may be affected by KMTF's activities, services and related actions through legislation, contracts or indirectly (indirectly); this definition does not include all those who may be familiar with or express an opinion about KMTF; key stakeholder representatives are participants, employees, customers, suppliers, government agencies, subsidiaries, creditors, investors, and other stakeholders.
Commercial bribery	The unlawful transfer of money, securities or other property to a person performing managerial functions in a commercial or other organization, as well as the unlawful provision of services of a proprietary nature 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 bribe taker.

¹ The term "Bribe" is used to describe the bribery of a civil servant, while the term "Commercial Bribery" is commonly used to describe the bribery of an employee of a commercial structure.

² "Person permanently, temporarily or by special authority performing organizational and administrative functions" means: performing managerial functions on the basis of an assignment, power of attorney or management decision.

Compliance system	A system of internal control over KMTF processes, policies, procedures, measures taken by KMTF to ensure the achievement of anti-corruption objectives, including the implementation of an effective set of preventive (preventive) measures to prevent violations of applicable anti-corruption laws, requirements of industry regulations and internal documents of KMTF, as well as measures to detect and prevent corruption and other violations (abuses) in order to ensure high professional and ethical standards of the organization.
Compliance function	A process managed by an authorized person of KMTF, whose main task is to build an effective compliance system at KMTF, monitor compliance risk management and perform other functions as stipulated by internal documents of KMTF.
Counterparty	an individual or legal entity, regardless of citizenship, residence or place of registration, with whom KMTF has entered into or plans to enter into contract/agreement, including, but not limited to, for the provision of various consulting and other services.
Conflict of interest	any situation or circumstances in which the personal benefit or activities of an Employee or an Officer of KMTF conflict with the interests of KMTF or may potentially conflict with them and thus may lead to improper performance of their official duties and affect the objectivity of decisions on matters related to KMTF.
Corruption	offering, promising, giving or receiving an illegal benefit, tangible or intangible, in any form, directly or through intermediaries, including in the form of bribes and commercial bribery; and/or Mediation in the performance of a corrupt act; and/or abuse of official position, abuse of authority, as well as other illegal use by a natural person of his/her official position contrary to the legitimate interests of KMTF, including for the purpose of obtaining an illegal benefit, tangible or intangible, for himself/herself or for a third party.
Corruption offense	An unlawful culpable act (action or inaction) related to the use of one's official position or deliberate failure to perform one's official duties in order to obtain a personal benefit, which facilitates the commission of corrupt acts or concealment of an already committed offense for which the law establishes administrative or criminal liability.
Corrupt act	Unlawful use by an Employee of his/her official position for personal gain or presentation of benefits to third parties to the detriment of the interests of KMTF, the state, for which administrative or criminal liability is not established by law, but which violates a provision of this Policy.

Referring Party	an organization that has entered into a contract with KMTF for the provision of personnel services (outstaffing) in the current year.
Passive bribery	requesting, demanding, agreeing to accept or receive a bribe, directly or indirectly
Politically exposed person	1) Civil servant - a citizen of the Republic of Kazakhstan or other state, holding a public position in a state body and exercising official powers for the purpose of realization of tasks and functions of the state; 2) An official of a state body - a person who permanently, temporarily or by special authority performs the functions of a representative of power or performs organizational and administrative or administrative and economic functions in state bodies; (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 international court, as well as officials in the armed forces and other military formations of a foreign state.
Mediation in bribery / commercial bribery	Facilitating the bribe-receiver and bribe-giver in reaching or implementing an agreement between them on receiving and giving a bribe, including direct transfer of the bribe/the object of commercial bribery (illegal remuneration) on behalf of the bribe-giver/the person, transferring the object of commercial bribery or the bribe-giver/person receiving the object of commercial bribery, or other assistance to the bribe-giver and (or) the bribe-receiver/participants in reaching or implementing an agreement between them on receiving and giving a bribe/commercial bribe.
Anti-corruption	activities of KMTF Employees and Officials to prevent (prevent) corruption, including formation of an anti-corruption culture, identification and elimination of causes and conditions conducive to the commission of corruption offenses, as well as identification, suppression, disclosure and investigation of corruption offenses and elimination of their consequences.
Prevention of corruption risks	measures aimed at introducing elements of corporate culture, organizational structure, rules and procedures regulated by internal documents that ensure the prevention of corruption offences at KMTF.
Employee	a person who has an employment relationship with KMTF and directly performs work under an employment contract, as well as other persons engaged on the basis of an employment contract

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	concluded by the Sending Party in accordance with a contract for the provision of personnel services (outstaffing).
RK	Republic of Kazakhstan
Relatives	brothers, sisters, parents and children of spouse full and half brothers and sisters, parents and children of spouse
Country of incorporation	State under whose laws the Sub. is incorporated
Incentive payments	Payments to Politically Exposed Persons to expedite routine official actions (e.g., issuance of permits, licenses, or other official documentation; issuance of visas, work permits, and other immigration documentation; expediting clearance for release of goods from customs; expediting state registration of real property or vehicles; expediting the provision of utilities or other services (e.g., telecommunications, security); etc.)
Family members of persons equalized for the performance of state functions	spouse, parents, children, including adult children, and persons dependent on and permanently residing with him/her
BRIBERY MANAGEMENT SYSTEM	anti-bribery management system
CEO/Chairman of the Management Board	Chief Executive Officer.
CEO-1	the level of management below the Chairman of the Board (CEO) according to the organizational structure. ³
CEO-2	a level of management subordinate to CEO-1 according to the organizational structure ³
SU	structural unit
SU LS	SP responsible for legal support
SU RM	SP, or KMTF employee responsible for monitoring compliance with this Policy
HR SU	SP responsible for human resources management

4. RESPONSIBILITY

4.1. KMTF employees / Officials in the performance of their job duties shall:

4.1.1. familiarize himself/herself with the Policy and sign an obligation to comply with the Policy. The obligation shall be executed in the form of an annex to the employment contract or civil law contract in the form according to [Appendix 1](#) to the Policy;

4.1.2. be guided by the memo according to [Appendix 2](#), which lists the basic concepts and examples of inadmissible corrupt behavior;

³ The definitions of the terms "CEO-1" and "CEO-2" are applicable for the purposes of this Regulation

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4.1.3. take into account compliance with the Policy when assessing the Employee's business qualities, including in case of appointment to a higher position and other personnel issues;

4.1.4. strictly comply with the restrictions and requirements stipulated by the Policy, including those related to giving, receiving gifts, making hospitality, charitable and sponsorship activities, participation in political activities, interaction with representatives of the state, Politically Exposed Persons and public organizations, with Counterparties, intermediaries, third parties, avoiding Conflict of Interest, keeping accounts;

4.1.5. strictly observe a categorical prohibition on the following actions:

4.1.5.1. participate in corrupt practices, including offering, promising, giving bribes to Politically Exposed Persons;

4.1.5.2. ask for and receive Bribes or offer or receive Commercial Bribery;

4.1.5.3. engage in Commercial Bribery of Counterparties or Counterparties to Employees/Officers, be in any way interested in entering into a contract or agreement with a particular Counterparty, unreasonably insist on engaging a particular Counterparty (whether represented in a consortium or independently) and fail to consider the interests of KMTF when selecting a Counterparty;

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

4.1.6. Officials in the performance of their official duties shall strictly observe the categorical prohibition to accept bribes from KMTF's Counterparties and other third parties, as well as to initiate, offer and give a Bribe either personally or through intermediaries, whether from among Employees or other third parties;

4.1.7. comply with the anti-corruption requirements and restrictions established by other internal documents of KMTF (to the extent not contradicting the Policy).

4.1.8. Officials in the performance of their official duties must accept the anti-corruption restrictions established by the current legislation on combating corruption in accordance with [Appendix 4](#) to the Policy.

4.1.9. Within the terms and in accordance with the procedure established by the tax legislation of the Republic of Kazakhstan to submit declarations of assets and liabilities, income and property.

4.2 Employees and Officials of KMTF when interacting with Counterparties shall:

4.2.1. establish and maintain business relations only with those Counterparties who conduct business relations in good faith and honesty;

4.2.2. take care of their own reputation;

4.2.3. demonstrate support for high ethical standards in conducting business activities;

4.2.4. implement its own anti-corruption measures.

4.3. SU RM is responsible for:

4.3.1. implementing a procedure for vetting Counterparties to reduce the risk of KMTF, Employees or Officers being involved in corrupt activities and other unfair practices (*including*

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collecting and analyzing publicly available information on potential Counterparties, such as their reputation, length of time in the market, involvement in corruption scandals, etc.);

4.3.2. posting on the official website of the KMTF information on corruption prevention measures taken by the KMTF;

4.3.3. updating this Policy;

4.3.4. organizing the explanation of this Policy to Employees and Officials;

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

4.4. **The SU LS** shall be responsible for inclusion of provisions on compliance with anti-corruption standards in the contracts concluded with the Counterparties - anti-corruption clause in the form stipulated in [Appendix 3](#).

4.5 **The HR SU** shall be responsible for:

4.5.1. recording of consents to the adoption of anti-corruption clauses by KMTF Employees and Officials;

4.5.2. one-time submission by the Officials of declarations on income and property, assets and liabilities when concluding the contract;

4.5.3. taking action against Employees and Officers who have violated the Policy.

5. REGULATORY AND LEGAL FRAMEWORK

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

5.2. In drafting this Policy, the contents of the following documents have been taken into account:

5.2.1. Criminal Code of the RK dated July 3, 2014;

5.2.2. Law of RK dated November 18, 2015. "On Combating Corruption";

5.2.3. KMTF Code of Business Ethics;

5.2.4. Policy on settlement of conflicts of interest in employees and officials of KMTF and its Sub.;

5.2.5. National Standard of the RK Anti-Bribery Management System ST RK ISO 37001-2017.

5.3. The main requirements of the above acts as they relate to commercial organizations are:

5.3.1. prohibition of giving bribes or the subject of Commercial Bribery;

5.3.2. prohibition of bribery of Politically Exposed Persons;

5.3.3. prohibition of Mediation;

5.3.4. prohibition of receiving bribes or the object of commercial bribery.

6. KEY PRINCIPLES ANTI-CORRUPTION

KMTF shall be guided by the following anti-corruption principles:

6.1. **"Zero Tolerance" principle** (rejection of corruption in any form or manifestation) - a complete prohibition for KMTF Employees and Officials, as well as other persons acting on behalf of and/or in the interests of KMTF, directly or indirectly, personally or through any Intermediary, to engage in corrupt practices regardless of business practices in any country;

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- 6.2. **the principle of "Tone from the Top"** - KMTF Officials by their behavior set an example to KMTF Employees to observe and promote high ethical standards of business conduct and reject corruption in any form;
- 6.3. **principle of due diligence** - taking a set of measures and actions aimed at obtaining necessary and reliable information about the Counterparty in order to minimize the risk of business relations with Counterparties;
- 6.4. **corruption prevention principle** - KMTF takes preventive measures in advance to prevent corruption, i.e. introducing elements of corporate culture, organizational structure, rules and procedures aimed primarily at identifying corruption risks and minimizing them;
- 6.5. **the principle of inevitability of punishment** - KMTF declares an irreconcilable attitude to any form or manifestation of bribery, fraud and corruption at all levels of corporate governance. Bringing guilty persons to responsibility is carried out regardless of their position and period of work in KMTF and other relations with it in accordance with the procedure established by the legislation and internal documents of KMTF;
- 6.6. **Monitoring and control** - KMTF monitors the implemented procedures for preventing and combating corruption, controls their compliance and regularly improves them;
- 6.7. **Cooperation in the field of anti-corruption** - KMTF recognizes the general social nature of the problem of corruption and the need to counteract it both through measures implemented within the framework of state policy and by creating intolerance to corruption on the part of KMTF Employees, Officials and Counterparties;
- 6.8. **Involvement of Employees and Officials in combating corruption** - KMTF aims to form a personal position of non-acceptance of corruption in any of its forms and manifestations by Employees and Officials. To this end, KMTF takes all necessary measures to implement the Policy at all levels of the organization and communicate its contents to its Employees and Officials, as well as other stakeholders. The KMTF promotes the level of anti-corruption culture of Employees and Officials through regular training on the basic requirements of the Policy and its application in practice;
- 6.9. **Principle of reliable reporting** - KMTF strictly complies with the requirements of legislation and the rules of record keeping. Each fact of economic life shall be formalized 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 RISKS OF CORRUPT PRACTICES

7.1. Informing and training

7.1.1. In order to form an appropriate level of corporate culture, KMTF Employees/Officers newly hired by KMTF are provided with induction training on the provisions of this Policy and related documents;

7.1.2. KMTF Employees/Officers shall be trained in person in the form of trainings, as well as by correspondence or distance learning by familiarizing themselves with this Policy, which is publicly available on KMTF's website and internal resources.

7.2. Screening of KMTF Counterparties and candidates for vacant CEO-1, CEO-2 positions

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7.2.1. Before making a decision on the beginning or continuation of business relations, when engaging candidates for the positions of CEO-1, CEO-2 or before extending employment relations with them, when interacting with Counterparties and other stakeholders, the KMTF checks their reliability, absence of Conflict of Interest, relationship with Politically Exposed Persons, analyzes information on reputation.

7.2.2. The procedure of verification of candidates for vacant positions of CEO-1, CEO-2 or for renewal of labor relations with them for compliance with the requirements established, including this Policy, is carried out in accordance with KMTF internal documents.

7.2.3. The procedure and criteria for verification of Counterparties and recipients of charitable/sponsorship assistance are set forth in the internal document on KMTF Counterparty due diligence.

7.3. Accounting and audit

7.3.1. In order to provide interested parties with complete and reliable information on the financial position, performance results and changes in financial position, KMTF maintains accounting, tax and management accounting in full compliance with the requirements of the legislation, international financial reporting standards and internal regulatory documents.

7.3.2. All financial and economic transactions are recorded in accounting and other types of accounting with due regard to the principles of completeness, reliability, comparability, appropriateness and clarity.

7.3.3. KMTF does not allow financial and economic operations without their reflection in accounting, distortion or falsification of accounting, management and other types of accounting data, primary accounting documents.

7.3.4. All business operations of KMTF are duly reviewed and approved by authorized Employees in accordance with the requirements of internal documents.

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

7.4. Execution of hospitality expenses and exchange of gifts

7.4.1. In accordance with the legislation of the Republic of Kazakhstan, KMTF prohibits Officials and Employees, as well as family members of these persons to receive and provide to third parties material remuneration, gifts and services (hereinafter - Gift) provided for actions (inaction) of this person in favor of the persons who provided/performed the Gift or other third parties, if such actions (inaction) are within the official powers of this person or he/she by virtue of his/her official position can facilitate such actions (inaction).

7.4.2. Gifts received without the knowledge of the Officials and (or) members of their families shall be subject to gratuitous transfer to the authorized body on state property management within 7 (seven) calendar days from the date of receipt of the Gift or from the date when the Official became aware of receipt of the Gift, and services rendered to the specified persons under the same circumstances shall be paid by transferring money to the republican budget within 7 (seven) calendar days from the date of rendering the services or from the date when the Official became aware of rendering the services.

7.4.3. Gifts received without the knowledge of the Employees shall be registered in the register of gifts with the KMTF Compliance Officer.

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7.4.4. Hospitality expenses, exceptional cases of gift exchange are regulated by the KMTF Code of Business Ethics.

7.5. Restrictions on charitable and sponsorship activities

7.5.1. KMTF does not directly provide charitable and sponsorship assistance to state bodies, commercial and non-commercial organizations, their representatives and other persons.

7.5.2. Charitable and sponsorship assistance may be provided by KMTF only by transferring funds to the Fund for Development of Social Projects "Samruk-Kazyna Trust" in coordination with KMG.

7.6. Refusal to participate in political activities

7.6.1. KMTF does not participate directly or indirectly in political parties, organizations and funds related to them, including not making sponsorship and other payments in support of them. At the same time, KMTF Employees and Officials have civil rights to participate at their own discretion in political activities in their free time, provided that such participation does not harm the interests of KMTF and does not create a Conflict of Interest.

7.7. Prosecution for acts of corruption

7.7.1. KMTF shall make all reasonable and lawful efforts to promptly and inevitably hold KMTF accountable for acts of corruption and other violations of anti-corruption laws and internal anti-corruption documents, regardless of the size and form of such violations.

7.7.2. KMTF reserves the right to make public, in accordance with the established procedure, information on persons held liable for corruption offenses established by this Policy.

7.8. Waiver of retaliation

7.8.1. KMTF guarantees that KMTF Employees/Officers who refuse to commit a corruption offense/corrupt act before it becomes known to KMTF will not be disciplined.

7.8.2. KMTF considers it unacceptable and strives to promptly identify and prevent retaliation, namely, actions aimed at discrimination, harassment or other negative consequences by third parties against KMTF Employees/Officers who in good faith report a suspected corruption offense committed by another KMTF Employee/Officer, even if such suspicion is not confirmed.

7.9. "Hotline"

7.9.1. In order to maintain a high level of trust in KMTF, to comply with international standards of ethical business conduct, as well as to prevent and suppress cases of fraud and corruption, KMTF operates a "Hotline".

7.9.2. By contacting the Hotline, any person may, in a convenient form, including on condition of anonymity, report facts of embezzlement, fraud, bribery, commercial bribery, conflict of interest, other manifestations of corruption and violations of the Policy.

7.9.3. Each appeal is carefully reviewed, the results of the review of the appeal are communicated to the responsible persons of KMTF, and, if there are grounds for it, an appropriate audit is conducted in accordance with KMTF internal documents and procedures.

7.9.4. Hotline contacts are posted on the official website of the KMTF on the Internet, on information boards and in other publicly accessible places.

7.10. Interaction with law enforcement agencies

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7.10.1. The KMTF undertakes to report corruption offenses of which it becomes aware to the relevant law enforcement authorities.

7.10.2. KMTF Employees may cooperate with law enforcement authorities in the following forms:

- 1) informing law enforcement authorities of cases of violations that have signs of corruption and fraud;
- 2) assisting law enforcement authorities in conducting measures to suppress or investigate corruption;
- 3) providing responses / participation in meetings (meetings) at the request of law enforcement authorities on the issues of preventing and combating corruption.

7.11. Anti-corruption restrictions. Financial control measures

7.11.1. In order to prevent persons equivalent to persons authorized to perform public functions, as well as persons who are candidates for these positions from committing actions that may lead to the use of their powers in personal, group and other non-business interests, these persons accept anti-corruption restrictions established by the current legislation of the Republic of Kazakhstan on combating corruption.

7.11.2. The consent of these persons to accept anti-corruption restrictions shall be recorded by the HR SU in writing in accordance with [Appendix 4](#) to the Policy.

7.11.3. Non-acceptance of anti-corruption restrictions by the above-mentioned persons entails refusal to accept a position or dismissal from a position (dismissal from a position), their non-compliance in cases where there are no signs of a criminal or administrative offense is grounds for termination of their respective activities.

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

7.11.5. Failure to submit or submission of incomplete, unreliable declarations and information, if the offense does not contain signs of criminal punishable act, is the basis for refusal to grant a person the appropriate powers or entails liability under the Code of the RK "On Administrative Offenses".

7.12. Organization of the anti-bribery system

7.12.1. KMTF has established and maintains an anti-bribery management system.

7.12.2. The KMTF Supervisory Board demonstrates leadership by:

- 1) Approving the Anti-Bribery Policy;
- 2) ensures the provision of sufficient and appropriate resources for the effective functioning of the SIPM;
- 3) supervises the development and implementation of the BMS in the KMTF, its effectiveness, and the sufficiency of the allocated resources for its effective functioning;
- 4) periodically, but not less than once a year, receives information on the development and functioning of the BMS and on measures taken in the area of anti-corruption;
- 5) periodically, but at least once a year, analyzes the achievement of the objectives and performance of the BMS.

7.12.3. The KMTF Board shall:

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- 1) ensures the development, implementation, maintenance and revision of the BMS;
- 2) takes the necessary measures for the effective functioning and continuous improvement of the BMS and compliance function;
- 3) provides sufficient and appropriate resources for the effective functioning of the AGMS;
- 4) ensures the promotion of a culture of compliance, anti-corruption and non-corruption within KMTF;
- 5) ensures that KMTF employees are informed about the importance of effective anti-corruption and compliance with the requirements of the compliance system;
- 6) motivates employees to proactively inform themselves (Hotline);
- 7) ensures that no employee is subjected to harassment, discrimination or disciplinary action for reporting, in good faith or on the basis of a reasonable belief, corruption violations occurring in the company, or for refusing to engage in corrupt practices, even if such refusal may result in losses to KMTF's business.

7.12.4. The BMS includes measures to:

- 1) developing and updating internal regulatory documents in the area of anti-corruption, anti-corruption restrictions, keeping records and storing evidence of the activities carried out;
- 2) 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 documents of KMTF on combating corruption;
- 6) development of objectives and measures to ensure the effectiveness of the BMS;
- 7) developing tools to inform counterparties and third parties about anti-corruption measures and restrictions in place at KMTF;
- 8) conducting an internal audit of the BMS and communicating its results to the Supervisory Board and the KMTF Management Board;
- 9) handling complaints regarding anti-corruption violations or suspicions thereof;
- 10) preparation of materials to be submitted to the Supervisory Board and the KMTF Management Board for management analysis;
- 11) selecting measures to improve the BMS.

7.12.5. KMG annually communicates through its representatives in the Supervisory Board its position on expectations regarding the measures taken in the field of anti-corruption, including the elimination of identified deficiencies, corruption risks, factors contributing to the commission of corruption offenses in subsidiaries and affiliates.

8. INTERACTION WITH POLITICALLY EXPOSED PERSONS AND THE PUBLIC

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

8.2. Any inappropriate interaction of KMTF Employee/Officer with Politically Exposed Persons is strictly prohibited.

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8.3. KMTF shall refrain from making any payments in favor of Politically Exposed Persons, as well as their Close Relatives, spouses, Relatives or payments for the benefit of these persons, including receiving material or other benefits from KMTF for the direct or indirect purpose of obtaining any improper advantages or preferences, including:

8.3.1. organization or payment (compensation) for participation in hospitality events;

8.3.2. organization or payment (compensation) for recreation, treatment and prevention of diseases;

8.3.3. organization or payment (compensation) of travel and other expenses.

8.4. In case of organizing an event with participation of politically important persons at the expense of the KMTF, the initiator of such an event must obtain prior approval of the event from the KMTF SU RM. At the same time, hospitality expenses shall not exceed the limits for hospitality expenses determined by Samruk-Kazyna JSC or the limits established by the legislation.

8.5. KMTF employees/officials shall not directly or through intermediaries offer, transfer, promise, certify the transfer of money, any other valuables or material or other benefit to Politically Exposed Persons in exchange or for the purpose of obtaining unlawful advantages or preferences.

8.6. KMTF Employees/Officers are prohibited, directly or through intermediaries, from offering, transferring or promising any Incentive Payment to Politically Exposed Persons.

8.7. KMTF Employees/Officers are obliged not to engage in behavior that could 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 and negotiations.

8.8. An employee/official of KMTF who has received information from Politically Exposed Persons that may be perceived as a request, demand, extortion, hint of transfer of money, any other valuables, material or other benefits in his/her favor or in favor of his/her Close Relatives, spouses, Relatives shall suspend business contacts with the relevant Politically Exposed Person and within 1 (one) working day notify the SU RM KMTF about the existence of such a situation and/or send information about it to the "Hotline".

8.9. Conclusion of contracts with Politically Exposed Persons, their Close Relatives, spouses, Relatives is a high corruption risk factor. To avoid such risk, the KMTF checks potential Employees and Counterparties for affiliation with Politically Exposed Persons in accordance with internal documents.

8.10. In case of any kind of doubts about the legality or ethicality of their actions, KMTF Employees/Officers are obliged to obtain advice from the KMTF SU RM.

9. CORRUPTION RISK ANALYSIS AND ASSESSMENT

9.1. KMTF in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents conducts internal analysis and assessment of corruption risks.

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

9.3. Corruption risks are identified through anti-corruption monitoring and internal audit of the BMS.

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9.4. The results of the analysis and assessment of corruption risks are used to analyze the performance of the BMS.

9.5. KMTF conducts anti-corruption monitoring in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents.

9.6. The subject of anti-corruption monitoring is information related to the effectiveness of anti-corruption policy, the state of law enforcement practice in the field of combating corruption, as well as the perception and assessment of the level of corruption in KMTF.

9.7. The results of anti-corruption monitoring are used to analyze corruption risks and assess the performance of the BMS.

10. RESPONSIBILITY FOR NON-FULFILLMENT (IMPROPER FULFILLMENT) OF THE POLICY

10.1. Responsibility for compliance with the requirements of this Policy lies with each Employee / Officer regardless of their position.

10.2. Committing corruption offenses and/or fraudulent acts by an Employee/Officer shall be considered a gross violation of employment duties.

10.3. An Employee/Officer, regardless of his/her status and position, shall be held liable. Prosecution is carried out in accordance with the laws of the Republic of Kazakhstan.

10.4. In case of detection and establishment of involvement of an Employee/Officer in committing corruption offenses and/or fraudulent actions, KMTF has the right to bring the Employee/Officer to disciplinary responsibility, including in the form of termination of the contract in accordance with the procedure established by the current legislation of the Republic of Kazakhstan.

10.5. If there are sufficient grounds, the materials of internal investigation on the above facts shall be transferred to the law enforcement authorities with a request to bring the guilty persons to administrative or criminal responsibility.

10.6. In case of causing harm and damage to KMTF, KMTF reserves the right to file a civil suit in court against the person who committed corruption offenses and/or fraudulent actions.

10.7. The Chairman of the Management Board/General Director of KMTF shall bear disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan for non-performance or improper performance of his/her official duties to prevent the commission of corruption offenses by subordinate employees.

10.8. The Chairman of the Management Board/General Director of KMTF bears disciplinary responsibility for the commission of corruption offenses by employees directly subordinated to him, if the following conditions are combined:

10.8.1. A link is established between a corruption offense committed by a subordinate employee and guilt in the non-performance or improper performance of official duties to prevent the commission of corruption offenses;

10.8.2. The subordinate employee is subject to an enforceable judicial act of criminal prosecution for a corruption offense or the criminal case for a corruption offense has been terminated by a criminal prosecution body or a court on the basis of paragraphs 3), 4), 9), 10), 11) and 12) of part one of Article 35 or 36 of the Code of Criminal Procedure of the Republic of Kazakhstan.

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11. FINAL PROVISIONS

11.1. In order to comply with international standards of business ethics, openness and transparency of business conduct, KMTF Employees/Officers shall notify the SU RM of all cases of their inducement to commit corruption offenses, in accordance with KMTF internal documents.

11.2. In case of doubts regarding the legality of actions of other KMTF Employees/Officers or Counterparties, possible corrupt practices and other violations, including embezzlement, fraud, bribery, Commercial Bribery, Conflict of interest and other KMTF Employee/Officer, Counterparty or other person may, in the form of an open dialog (including anonymously), report his/her doubts to the KMTF SU RM or contact the "Hotline" in accordance with the procedure established by KMTF internal documents.

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Appendix 1
Appendix to the Labor Agreement

COMMITMENT TO COMPLY WITH THE ANTI-CORRUPTION POLICY
ANTI-CORRUPTION POLICY
TOO NMSC KAZMORTRANSFLOT AND ITS SUBSIDIARIES

1. The employee (a *person who has concluded a civil law contract with KMTF*) confirms that he/she has familiarized himself/herself with the contents of the Anti-corruption Policy of "NMSC "Kazmortransflot" LLP and its subsidiaries (hereinafter referred to as the Policy) and the Code of Business Ethics of "NMSC "Kazmortransflot" LLP (hereinafter referred to as the Code) and undertakes to comply with them.

2. The employee undertakes:

2.1 Not to engage in corrupt practices directly or indirectly, personally or through the Intermediation of third parties, including not to offer, give, promise, request or receive Bribes and facilitation payments in any form (Facilitation Payments), including in the form of money, valuables, services or other benefits, to and from any person or organization, including commercial organizations, government and self-government bodies, Kazakhstani and foreign government officials, private companies and their representatives.

2.2 Refrain from behavior that may be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests or on behalf of "NMSC "Kazmortransflot" LLP (hereinafter - KMTF).

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

- 1) about cases of inducement of the Employee to commit corruption offenses;
- 2) about information known to the Employee about cases of corruption offenses committed by other Employees, KMTF Counterparties or other persons;
- 3) of the possibility of a Conflict of Interest that the Employee may have or has had.

3. The Employee has familiarized himself/herself with the opportunity to report to the KMTF Hotline, the SP responsible for monitoring compliance with the Policy, any suspicions about the legality or ethics of his/her actions, as well as the actions, inactions or suggestions of other Employees, Counterparties or other persons who interact with KMTF.

4. It is made clear to the Employee that no KMTF Employee, including him/her, will be sanctioned or prosecuted by KMTF if he/she has reported suspected corruption, or if he/she has refused to give or receive a Bribe, commit Commercial Bribery or in any other way Mediate Bribery, including that KMTF has suffered a loss of profit or commercial and competitive advantage as a result of such refusal.

5. The Employee has been warned of the possibility of disciplinary, administrative, civil and/or criminal liability for violation of anti-corruption requirements of Kazakhstan and other applicable laws, as well as the Policy and the Code.

6. It is explained to the employee that if he/she has additional questions about the principles and requirements of the Policy and applicable anti-corruption laws, he/she may contact the SPOC responsible for monitoring compliance with the Policy.



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" ____ " _____ 20__ г. _____ / _____

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Annex 2

MEMO OF THE EMPLOYEE OF JSC "NMSC "KAZMORTTRANSFLOT" ON COMPLIANCE WITH THE REQUIREMENTS OF ANTI-CORRUPTION LEGISLATION

1. What behavior is prohibited?

The Anti-Corruption Policy of "NMSC "Kazmortransflot" LLP and its subsidiaries (hereinafter - the Policy) prohibits any form of corruption: Abuse of office, giving a bribe (Active Bribery), receiving a bribe (Passive Bribery), Mediation, abuse of authority, Commercial Bribery or other illegal use by an individual of his/her official position contrary to the interests of "NMSC "Kazmortransflot" LLP (hereinafter - KMTF) and the state, to obtain a benefit in the form of money, valuables, other property or services of a proprietary nature, other proprietary rights for themselves or third parties, or illegal provision of such benefit to the specified person by other individuals, as well as the commission of these acts on behalf of or in the interests of a legal entity.

2. What is a Bribe?

A bribe is material valuables (objects 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 done by virtue of his official position.

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

- 1) financial payments or promises of payments in cash or cash equivalents (e.g. gift vouchers),
- 2) gifts, entertainment and hospitality (e.g. travel, meals and accommodation),
- 3) services,
- 4) loans and valuable collateral,
- 5) property or any interest in property of any kind,
- 6) protection from penalty and release from any obligation,
- 7) anything provided for improper remuneration,
- 8) providing practice, work experience, or offering temporary, or permanent employment (including providing the same services/benefits to Immediate family members, spouses, Relatives),
- 9) political or charitable contributions.

The defense of bribery may not be used to prove that the Bribe is a necessary measure in any local industry, business, profession or vocation.

3. Active Bribery

It is always unacceptable for KMTF Employees/Officers to:

- 1) Offer, promise or pay bribes, including Incentive Payments, other illegal payments or advantages to or for the benefit of, or at the direction of, Politically Exposed Persons;
- 2) facilitate, mediate, aid or assist or provide support for such behavior.
- 3) A breach of the Policy occurs if an Employee/Officer of KMTF offers, attempts to pay or pays, intermediates a bribe to a Politically Exposed Person, even if the Employee/Officer of KMTF does not receive a benefit in return.

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4. *Passive Bribery*

KMTF Employees/Officers are prohibited from:

1) solicit, demand, agree to receive or accept a bribe from a Politically Exposed Person. This prohibition applies whether the Employee receives the bribe for his/her own benefit or on behalf of another person.

A violation of the Policy occurs if a KMTF Employee/Officer requests or demands a bribe; the bribe may not actually be paid.

2) *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 services of a property nature 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 who performs the bribery.

3) *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:

- 1) induce or encourage improper behavior on the part of the recipient or another person (Commercial Bribery); or
- 2) influence a Politically Exposed Person (unlawfully or otherwise) in the performance of their official duties in order to obtain or retain a commercial advantage.

The granting of an advantage is likely to be a Bribe if:

- 1) it is illegal under the relevant anti-corruption and bribery laws;
- 2) it creates an obligation or the appearance of an obligation for another party;
- 3) it is intended to induce a person to act or omit to act in order to provide some benefit or general support to the person providing the advantage or to the organization of the person providing the advantage;
- 4) it is given to a Politically Exposed Person to influence an employee with respect to his or her official duties, to expedite the performance of official duties, or to obtain general support from such person;
- 5) it is unreasonable in terms of cost, frequency or manner of provision.

4) *What else is prohibited?*

It is also unacceptable for you to:

- 1) engage in financial misconduct, including criminal behavior such as stealing funds and making false reports, insider trading, money laundering or misappropriation of funds;
- 2) use or privately offer others access to or use of KMTF resources, including assets, funds or intellectual property, without prior authorization from KMTF;
- 3) attempt to induce an individual employee of a commercial organization, a governmental (in whole or in part) organization or a Politically Exposed Person to engage in illegal conduct;
- 4) offer, give or authorize Bribes/Commercial Bribery, directly or indirectly, through an agent or associate:
 - a. To a politically exposed person, or

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b. To a manager, officer or employee of a commercial, or other organization;

5) Offer or provide an unauthorized benefit (proprietary or otherwise) to an employee of any competitor, supplier or customer of KMTF that could result in an unfair competitive advantage and a violation of applicable competition provisions, such as any benefit that could result in an improper advantage of KMTF over its competitors;

6) use any connections you may have with Politically Exposed Persons for the purpose of unlawfully obtaining a competitive advantage with respect to KMTF;

7) fail to report indications of illegal payments or favors under the Policy or any circumstances that give reason to suspect such behavior;

8) take actions, including fraudulent false statements, that induce a party to obtain a financial or other benefit, or to evade an obligation;

9) attempt to conceal or cover up any of the above.

I am familiar with the memo and everything has been read and explained in full.

ФИО _____

Signature _____ Date _____

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Appendix 3

Example of Anti-Corruption Clause for Contracts with Counterparties

1. [*Name of Contract Counterparty*] agrees to ensure that all of its affiliated persons and entities acting hereunder (each hereinafter referred to as an "Affiliate"), including without limitation the owners, directors, officers, employees and agents of [*Name of Contract Counterparty*], comply with the safeguards of this clause.

2. [*Name of Contract Counterparty*] and all Affiliates agree not to do, directly or indirectly, the following:

2.2.1. Pay, offer, promise or authorize the payment of any money or provide any other thing of value (including gifts, entertainment and subsidies) to any government-related persons for the purpose of improperly obtaining, retaining or conducting business or obtaining unlawful advantages for KMTF.

2.2.2. Not engage in any other conduct that violates applicable laws prohibiting bribery in commerce, including Commercial Bribery and other unlawful and improper means of conducting business.

3. [*Name of contract counterparty*] [is not]⁴ a government-related entity and [does not have]⁵ Politically Exposed Persons who are its officers, employees, or direct or indirect owners. The [*Name of Contract Counterparty*] agrees to promptly inform KMTF in writing of all instances in which any Politically Exposed Person becomes an officer or employee of [*Name of Contract Counterparty*] or acquires a direct or indirect interest in [Name of Contract Counterparty].

4. [*Name of Contract Counterparty*] is established for legitimate business purposes, not for any illegal purpose, and has only legitimate sources of funding.

5. [*Name of Contract Counterparty*] and its Affiliates have not been convicted of or pleaded guilty to any unlawful acts involving fraud or corruption. [*Name of Contract Counterparty*] agrees to immediately inform KMTF in writing if [*Name of Contract Counterparty*] or any of its Affiliates are convicted of or found guilty of such unlawful acts.

6. [*Name of Contract Counterparty*] confirms that he/she has read the Code of Business Ethics of NMSC Kazmortransflot LLP (hereinafter referred to as the Code) and the Anti-corruption Policy of NMSC Kazmortransflot LLP and its subsidiaries (hereinafter referred to as the Policy) on the official website of NMSC Kazmortransflot LLP (hereinafter referred to as KMTF). [*Name of contract counterparty*] certifies that it fully understands the Code and the Policy.

7. [*Name of contracting party*] agrees to assist and cooperate in good faith with KMTF in the event of an actual or potential violation of the requirements of this Anti-Corruption Clause, including the obligation to make available the opportunity to interview its owners, directors, officers and other Affiliates.

⁴ It is necessary to modify the text if the Counterparty is a government-related person

⁵ If available, the text should be modified and a list of public officials should be obtained

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8. [*Name of Contract Counterparty*] agrees to report to KMTF in a timely manner all violations of the Anti-Corruption Clause related to KMTF's business. In order to report cases of violation of the requirements of the [*Name of contractual counterparty*], [Name of contractual counterparty] is obliged to use the "Hotline", information about which is available on the official website of the KMTF.

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Appendix 4

Consent to the adoption of anti-corruption restrictions and prohibitions

I, (full name) _____, accept anti-corruption restrictions and prohibitions according to the Law of RK "On Combating Corruption" on:

- 1) inadmissibility of joint service (work) of close relatives, spouses and in-laws;
- 2) the implementation of activities that are incompatible with the performance of official duties in KMTF and its subsidiaries;
- 3) use of official and other information that is not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
- 4) accepting material remuneration, gifts or services for actions (inaction) in favor of persons providing them, if such actions are within my official powers, or I can contribute to such actions (inaction) by virtue of my official position;
- 5) participation in gambling games and/or betting in gambling establishments that fall under the definition provided by the Law of the RK "On Gambling", as well as participation in gambling games and/or betting in unauthorized places or gambling games and/or betting conducted through the use of telecommunications networks, including the Internet;
- 6) 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 the job duties in accordance with the laws of the Republic of Kazakhstan, to promote the satisfaction of material interests of organizations or individuals through the misuse of their official powers in order to obtain property or other benefits;
- 7) not to engage in other paid activities, except for pedagogical, scientific and other creative activities.

I am aware of the responsibility established by the current legislation of the Republic of Kazakhstan for failure to comply with the restrictions and prohibitions established by the legislation of the Republic of Kazakhstan on combating corruption.

FULL NAME. _____

Signature: _____ Date _____