

APPROVED
by the decision of the Board of Directors
JSC NC «Kazakhstan Engineering»
dated December 30, 2022
(Protocol №. 21)

ANTI-CORRUPTION INSTRUCTIONS
JSC «KAZAKHSTAN ENGINEERING» NC»

Astana

1. General provisions

1. This Instruction on Combating Corruption of JSC «Kazakhstan Engineering» NC» (hereinafter referred to as the Instruction, the Company, respectively) defines what refers to actions of a corrupt nature, establishes the procedure for the actions of officials and employees of the Company in the event of a situation of a corrupt nature.

2. The requirements given in this Instruction are the minimum necessary and should not be considered as exhaustive and/or limiting for a particular case.

2. Basic terms and definitions

3. The following terms and definitions are used in this Instruction:

1) **A bribe** - is money, securities, other assets, property rights or property benefits received by a person authorized to perform state functions, or a person equated to him, or a person holding a responsible public position, or an official, as well as an official of a foreign state or an international organization personally or through an intermediary.

2) **Official** – member of the Board of Directors of the Company, member of the Management Board of the Company;

3) **Commercial bribery** - illegal transfer of money, securities or other property to a person performing managerial functions in a commercial or other organization, as well as illegal provision of property-related services to him for using his official position, as well as for general patronage or connivance in the service in the interests of the person engaged in bribery.

4) **Conflict of interests** – a contradiction between the personal interests of officials / employees and their official powers, in which the personal interests of these persons may lead to improper performance of their official powers;

5) **Corruption** – illegal use by Company officials of their official (official) powers and related opportunities in order to obtain or extract property (non-property) benefits and advantages for themselves or third parties personally or through intermediaries, as well as bribery of these persons by providing benefits and advantages;

6) **Anti-corruption** - the Company's activities within its powers to prevent corruption, including the formation of an anti-corruption culture in the Company, the identification and elimination of causes and conditions conducive to the commission of corruption offenses and the elimination of their consequences;

7) **Employee** – an individual who is in an employment relationship with the Company;

3. Possible situations of corruption and commercial bribery, as well as recommendations on the rules of conduct

4. In order to avoid possible provocations on the part of citizens who applied for the service, officials who check the activities of the structural division of the Company:

1) do not leave unattended office premises in which visitors are located, and personal belongings (clothes, briefcases, bags, etc.);

2) in case of detection of any foreign objects in the workplace or in personal belongings after the visitor leaves, without taking any independent actions, immediately report to the management.

5. When offering a bribe to an official, an employee of the Company, it is necessary:
 - 1) behave extremely cautiously, politely, without fawning, not allowing rash statements that could be interpreted either as willingness or as a categorical refusal to accept the subject of a bribe and/or commercial bribery;
 - 2) listen carefully and remember exactly the conditions offered to you (the amount of amounts, the name of goods and the nature of services, the timing and methods of transferring a bribe, the form of commercial bribery, the sequence of solving issues);
 - 3) try to postpone the question of the time and place of the transfer of the subject of the bribe and/or commercial bribery until the next conversation and offer a place you are familiar with for the next meeting;
 - 4) do not take the initiative in the conversation, "work for the reception" more, let the interlocutor "talk it out", tell you as much information as possible;
 - 5) ask about guarantees of the solution of your question in case of your consent to give a bribe or commit commercial bribery;
 - 6) if you have a dictaphone, try to record (secretly) a proposal about the subject of a bribe and/or commercial bribery;
 - 7) report this fact in the form of a memo to higher management;
 - 8) send a written or oral message to the Compliance Service by e-mail compliance.officer@ke.kz or by phone: +7 (7172) 72-52-52, internal 1110;
 - 9) submit a written or oral report on the impending crime to the authorized anti-corruption body or to the Call Center 1424.
6. If a conflict of interest arises between officials and employees of the Company:
 - 1) be attentive to any possibility of a conflict of interest;
 - 2) take measures to prevent any possibility of a conflict of interest;
 - 3) notify your immediate supervisor in writing about the conflict of interest that has arisen or about the possibility of its occurrence as soon as you become aware of it;
 - 4) take measures to overcome the conflict of interests that has arisen in agreement with the immediate supervisor;
 - 5) change the official position of an employee who is a party to a conflict of interests, up to his removal from the performance of official duties in accordance with the established procedure, and (or) in his refusal of the benefits that caused the conflict of interests;
 - 6) to form a commission on compliance with the requirements for official conduct and settlement of conflicts of interest.

4. Actions of officials and employees of the Company when making a decision to resist corruption

7. At your discretion, you can apply orally or in writing to the authorized anti-corruption body or to the Call Center 1424.
8. One of the forms of reporting a corruption offense is an anonymous appeal. Although in this case, the applicant cannot count on receiving a response due to anonymity, and the anonymous appeal about the crime itself cannot serve as a reason for initiating a criminal case, except in cases where such an appeal contains information about criminal offenses being prepared or committed.
9. In case of extortion of a bribe, you need to contact the authorized anti-corruption body and write a statement about the fact of extortion of a bribe or commercial bribery from you, in which you specify exactly:

1) which of the officials (surname, first name, patronymic, position, name of the institution) is extorting a bribe from you or which of the representatives of commercial structures are pushing you to commit bribery;

2) what is the amount and nature of the extorted bribe (bribery);

3) for what specific actions (or inaction) a bribe is being extorted from you or commercial bribery is being committed;

4) at what time, in what place and in what way the direct giving of a bribe should take place or commercial bribery should be carried out.

10. When detecting and/or encountering corruption crimes and situations with signs of corruption, along with contacting the authorized anti-corruption body, employees must take measures to notify the Company's Compliance Service: by e-mail compliance.officer@ke.kz or by phone: +7 (7172) 72-52-52, internal 1110;

11. An official, an employee who has reported the fact of a corruption offense, commercial bribery and other criminal offenses in the performance of his/her functional duties by an employee of the Company is protected by the state and is encouraged in accordance with the procedure established by the Government of the Republic of Kazakhstan.

12. Information about an official, an employee who assists in combating corruption, commercial bribery and other criminal offenses when performing their functional duties by employees of the Company is a state secret and is provided in accordance with the procedure established by law. Disclosure of this information entails liability established by law.

5. Final provisions

13. This Instruction is mandatory for familiarization and application by all officials and employees of the Company.

14. This Instruction is put into effect from the date of approval by the Board of Directors of the Company.

15. Amendments/additions made to the Instruction come into force from the date of its approval by the Board of Directors of the Company.