

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

ANTI-CORRUPTION STANDARDS
JSC «KAZAKHSTAN ENGINEERING» NC»

Astana

1. General provisions

1. The anti-corruption standards of JSC «Kazakhstan Engineering» NC» (hereinafter referred to as the Standards, the Company, respectively) have been developed in accordance with the Law of the Republic of Kazakhstan "On Combating Corruption" and methodological recommendations on this issue, are advisory in nature, and represent a system of prohibitions, restrictions and permits in all areas of the Company's activities.

2. The purpose of the anti-corruption standard is to define a system of recommendations aimed at preventing corruption, improving legal literacy and zero tolerance for corruption in the Company's activities.

3. Objectives of the Standards: prevention of corruption manifestations through the formation of sustainable anti-corruption behavior of officials, employees of the Company, the development of corporate values, work style and norms of behavior of employees of the Company, increasing transparency, transparency in the Company's activities.

4. Scope of application of Standards: the Company's activities.

2. Terms and definitions

5. The following terms and definitions are used in the Standards:

1) **anti-corruption legislation of the Republic of Kazakhstan** - the Law of the Republic of Kazakhstan "On Combating Corruption" and other regulatory legal acts on combating corruption;

2) **official** - member of the Board of Directors of the Company, member of the Management Board of the Company;

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

4) **a corruption offense** - is an unlawful guilty act (action or omission) that has signs of corruption, for which administrative and criminal liability is established by law;

5) **corruption risk** — the possibility of causes and conditions that contribute to the commission of corruption offenses;

6) **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;

7) **meritocracy** - is a management principle according to which personal merits and achievements, promotion of personnel in accordance with abilities and professional training are taken into account when selecting employees of the Company, including for managerial positions;

8) **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, as well as the identification, suppression, disclosure and investigation of corruption offenses, and elimination of their consequences;

9) **employees** — individuals who are in an employment relationship with the Company.

3. Standards of conduct (actions) mandatory for the Company's employees to perform their official duties

6. Employees of the Company, when performing their official duties, should be guided by the following standards:

1) Performing the assigned professional functions in good faith and properly and only in the interests of the state, the Company, applying all their knowledge and experience for this;

2) Preventing the commission of misdemeanors and other offenses for which the law provides for disciplinary, administrative or criminal liability;

3) Manifestation of personal activity in combating corruption, disclosure of corruption offenses;

4) Informing the immediate supervisor about the facts of corruption that have become known to him, as well as about the inducement to receive any benefit for expedited consideration of materials or red tape, as well as about doubts about the legality of the order received for execution;

5) Refusal to be appointed to a position if it is related to the direct subordination or control of persons who are in close family relations (parents, spouses, brothers, sisters, children);

6) Compliance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan and internal documents of the Company.

4. Standards in the field of managerial decision-making mandatory for heads of structural divisions and officials

7. Officials, heads of structural divisions in the performance of their official duties should be guided by the following standards:

1) To manage subordinates through sole administrative activities, and bear personal responsibility for the legality of decisions taken;

2) Evenly distribute the work load between employees who are subordinate;

3) To show fairness and objectivity in assessing the performance of subordinates, as well as in the application of incentives and penalties;

4) Identify possible corruption risks when performing their official duties, making managerial decisions; do not force subordinates to commit corruption offenses;

5) Know the business and moral qualities of their subordinates, be able to timely identify and prevent the actions (inaction) of subordinates that may lead to the commission of corruption;

6) not to give clearly impossible instructions (instructions) or beyond the scope of their official duties, as well as contrary to anti-corruption legislation;

7) not to use their official position to influence the activities of subordinates in solving personal issues.

5. Standards in the field of development, coordination and approval of internal regulatory documents of the Company

8. Officials, heads of structural divisions, as well as employees of the Company, when approving, approving internal regulatory documents of the Company, should be guided by the following standards:

1) When developing, approving and adopting internal documents of the Company (regulations, instructions, orders, etc.), strictly comply with the requirements of the Company's Charter and other internal regulatory documents of the Company, as well as prevent the development and adoption of internal regulatory documents, acts of the Company in order to benefit themselves, their own needs and third parties;

2) When conducting a legal examination of the Company's adopted internal regulatory documents, paying special attention to the presence of corruption-causing factors and discretionary powers of officials in them, which may create prerequisites for employees to commit illegal actions of a corrupt and other illegal nature.

6. Standards in the field of procurement related to the purchase of goods, works, services

9. Officials, heads of structural divisions, as well as employees of the Company when organizing purchases related to the purchase of goods, works, services should be guided by the following standards:

1) To prevent corruption in the preparation and conduct of procurement;

2) Avoid conflicts of interest in procurement. If any of the members of the tender commission has a conflict of interest, this person notifies the secretary of the tender commission, which is recorded in the protocol on the results of the open tender and the composition of the tender commission is changed. At the same time, this person does not participate in the decision-making by the tender commission.

7. Standards in the field of organization of personnel work on the selection and placement of employees

10. Officials and heads of structural divisions in the organization of personnel work on the selection and placement of employees should be guided by the following standards:

1) Strictly observe the principles of meritocracy;

2) When applying for a job, explain the main duties, prohibitions and restrictions imposed on the Company's employees;

3) Comply with the requirements of the labor and anti-corruption legislation of the

Republic of Kazakhstan in the selection of personnel;

4) To prevent the transfer of information about the personal data of the Company's employees to third parties, except in cases provided for by law;

5) Objectively and comprehensively conduct internal investigations against employees;

6) To prevent cases of recruitment and placement of personnel on the grounds of kinship, fraternity and personal devotion;

7) To prevent the commission of actions that may lead to the use of official powers and authority based on them in personal, group and other non-official interests.

8. Standards in the field of conflict of interest

11. The Company's officials and employees must strictly comply with the requirements of the legislation in the field of conflict of interest. It is prohibited to carry out official duties if there is a conflict of interests.

12. Employees of the Company who have a conflict of interest are obliged to notify in writing the immediate supervisor or the management of the Company in which they work about the conflict of interest that has arisen or the possibility of its occurrence as soon as they become aware of it.

13. The direct manager or the management of the Company, upon receiving a message from his subordinate employee about the appearance of a conflict of interest, including from other sources, must take timely measures to eliminate the conflict of interest, first of all, remove this employee from the execution of an assignment (work) where there is a conflict of interest and entrust its execution to another employee.

9. Standards in the field of interaction with the public, civil society institutions, and the mass media

14. In order to be open, transparent and create a positive image of the Company, officials and employees of the Company should develop constructive interaction with the public, civil society institutions and the media, while using the corporate website, social networks, Internet resources.

15. When interacting with the public, civil society institutions, the media, comply with the requirements of non-disclosure of official and commercial secrets, confidential information.

16. Every employee of the Company should understand and always remember that any point of view or information expressed by him as an employee of the Company is directly related to the Company itself, his image and affects his reputation in the business community.

10. Standards in the field of relations with third-party organizations and individuals

17. Officials of the Company and employees of the Company are prohibited from giving and accepting gifts, providing off-duty services to obtain property benefits, benefits

or advantages. In the performance of official duties, not to accept gifts from subordinates or other persons to whom his official powers apply, despite the reasons for their donation (holidays, birthdays, promotion, employment, etc.), as well as regardless of the type, quantity, cost and other characteristics of the gift (sweets, cakes, souvenirs, etc.).

18. Officials of the Company and employees of the Company must refuse invitations to intra-republican, foreign tourist, health and wellness and other trips at the expense of individuals and legal entities, with the exception of:

- carried out in accordance with international treaties of the Republic of Kazakhstan or by mutual agreement between state bodies of the Republic of Kazakhstan and state bodies of foreign states at the expense of the relevant state bodies and (or) international organizations;

- carried out with the consent of a higher official or body for participation in scientific, sports, creative, professional, humanitarian events at the expense of organizations, including trips carried out within the framework of the statutory activities of such organizations.

11. Consequences of non-compliance with Standards

19. An official of the Company and an employee of the Company who violates the requirements of these Standards shall be brought to disciplinary responsibility in accordance with the established procedure.

20. All cases of violation of Standards by members of the Company's Management Board, managing directors, heads of structural divisions, employees of the Company should be brought to the management - the Chairman of the Company's Management Board, the Chairman of the Audit Committee, the Board of Directors of the Company.

21. Each official and employee of the Company is personally responsible for compliance with the Standards.