

FAQ — Frequently Asked Questions

1. Code of Corporate Ethics

What is the Code of Corporate Ethics?

- *It is the primary internal document of the company that defines our values, workplace behavior standards, and principles of interaction with colleagues, clients, government bodies, and partners.*

Who is covered by the Code of Corporate Ethics?

- *It applies to all employees without exception, including full-time and freelance staff, managers of all levels, and members of the Supervisory Board.*

What should I do if I am not sure whether my action complies with the Code?

- *Use the self-check test (Is it legal? Is it safe? Is it honest?). If doubts remain, stop and seek clarification from your supervisor or directly from the Compliance Officer.*

What should I do if I witness behavior that might violate the Code?

- *You are required to immediately report this fact to the Compliance Officer or via the Unified Hotline channels. Concealing information about violations (especially corruption-related) violates the laws of the RoK and internal regulations.*

Can I report a violation of the Code confidentially?

- *Yes. The company guarantees absolute confidentiality and protection against any form of pressure or retaliation. You can submit a report **completely anonymously** through the online form on the website or the Hotline phone number.*

What is a conflict of interest?

- *This is a situation where an employee's personal or family interest influences (or may influence) the objectivity of their business decisions made on behalf of the company.*

What should be done when a conflict of interest arises?

- *An employee must immediately notify their manager and the compliance service in writing (by filling out a Conflict of Interest Declaration) and temporarily recuse themselves from making the decision that caused the conflict.*
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2. Counterparty Code of Business Ethics

What is the Counterparty Code of Business Ethics?

- *It is a set of rules and standards for integrity, transparency, and compliance that "KPI Inc." LLP requires from all of its business partners.*

Who is covered by the Counterparty Code of Business Ethics?

- *All potential and existing partners without exception: suppliers of goods, contractors, subcontractors, consultants, and agents.*

What are the main requirements for counterparties?

- *Strict compliance with the laws of the RoK, zero tolerance for any forms of corruption and "kickbacks," timely disclosure of conflicts of interest, and maintaining fair competition.*

Can KPI verify the integrity of a counterparty?

- *Yes. The company implements a mandatory compliance verification procedure (Due Diligence). We assess tax compliance, business reputation, and affiliation risks prior to concluding a contract.*

What should a counterparty do if they are offered an unlawful reward on behalf of a KPI employee?

- *Flatly refuse and immediately report it to the **(Hotline)**. Consent or concealment of the fact is considered complicity and leads to the termination of the business relationship.*

What should a counterparty do if they have information about a potential violation by a KPI employee?

- *Submit a message via the website form, email, or Hotline phone number. You can do this **completely anonymously**. Please provide specific facts, dates, and names of the participants.*

Is a counterparty obligated to comply with KPI's anti-corruption requirements?

- *Yes, this is a mandatory condition. In accordance with Art. 16-1 of the Law of the RoK "On Combating Corruption", an Anti-Corruption Clause is included in all our contracts; its violation leads to immediate termination of the agreement.*
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3. Anti-Corruption Policy

Why does KPI need an Anti-Corruption Policy?

- *The document establishes unified standards for protecting the business against corruption risks, defines the obligations of employees and partners, and ensures full compliance of "KPI Inc." LLP operations with the anti-corruption laws of the RoK.*

What approach does KPI take towards corruption?

- *The company adheres to the principle of **absolute Zero Tolerance** to any manifestations of corruption and fraud. Any corrupt practices entail immediate dismissal of the employee, termination of the contract with the partner, and referral of the materials to law enforcement authorities.*

What is considered corruption?

- *The unlawful use by an employee of their official position to obtain personal material benefit or advantages, as well as the provision of such benefits by third parties (bribe-giving, bribe-taking, commercial bribery, mediation in bribery).*

Can a gift be given to a KPI employee?

- ***It is strictly prohibited** to give gifts (including money, services, discounts) for the performance of official duties. For employees equated to persons authorized to perform state functions under the laws of the RoK, an **absolute ban applies (the limit is zero)**. Only standard seasonal souvenirs (notebooks, calendars) within business hospitality are allowed.*

Can a KPI employee be invited to a business event?

- *Yes, provided that the event is of an exclusively official, professional, or educational nature, directly related to the company's activities, and does not aim to influence KPI's commercial or procurement decisions.*

Can a KPI employee be offered payment for their expenses?

- *No. Payment of travel, accommodation, meals, or entertainment expenses of a KPI employee by a third-party organization is regarded as providing a hidden material benefit and is strictly prohibited, unless expressly provided for by the terms of an official contract between the companies.*

What is an undue advantage?

- *Any material benefits, money, securities, property rights, services, or intangible advantages (privileges, preferences) provided to a person unlawfully in exchange for performing or refraining from performing certain actions in the line of duty.*

What should I do if I am offered a bribe?

- *Flatly refuse to accept the benefit, record the details (date, time, name), and immediately report to the Compliance Service via the **(Hotline)**. Under RoK law, concealing such a fact is a separate offense.*

What should I do if I am required to give a bribe?

- *Firmly refuse to transfer any unlawful rewards. Stop discussing the matter and immediately report the extortion to the Compliance Officer or the Samruk-Kazyna Unified Hotline. The company technically guarantees you **100% anonymity and protection** against any retaliatory measures.*

4. Anti-Corruption Instruction

Why is the Anti-Corruption Instruction needed?

- *The Instruction helps KPI employees act correctly in situations involving corruption risks, gifts, conflicts of interest, and other potentially risky scenarios.*

I am being offered a gift. What should I do?

- *Employees are prohibited from accepting gifts, services, or other rewards in connection with the performance of their official duties, except for symbolic gifts and tokens of attention provided for by the Instruction. If in doubt, please contact the Compliance Service.*

I am being offered a discount, service, or other personal benefit in connection with my work. Can I accept it?

- *If the benefit is related to your position or the performance of your official duties, it cannot be accepted. In case of doubt, contact the Compliance Service.*

An acquaintance of mine works for a company that wants to enter into a contract with KPI. Do I need to report this?

- *If this could affect your objectivity or create a conflict of interest, it must be reported to the Compliance Service in accordance with the established procedure.*

I am being asked to help a relative get a job at KPI. What should I do?

- *You must not use your official authority or influence to provide an advantage to a relative. If the situation could lead to a conflict of interest, report it to the Compliance Service.*

I am being offered a meeting with a government official without official registration of the meeting. What should I do?

- *If such a meeting could create a corruption risk or raise doubts about the objectivity of your actions, contact the Compliance Service for advice.*

A supplier offers to pay for my dinner after a business meeting. Can I agree?

- *If the offer is related to the performance of your official duties, it should not be accepted. In case of doubt, consult with the Compliance Service in advance.*

What should I do if my supervisor asks me to perform an action that might violate anti-corruption requirements?

- *Inform the supervising Key Employee and the Compliance Service within one working day.*

I am not sure if a specific situation constitutes a corruption risk. Do I need to report it?

- *Yes. It is not necessary to determine on your own whether a situation is a violation. If it raises reasonable doubts or shows signs of a corrupt nature, report it or contact the Compliance Service.*
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5. Hotline — Reporting Violations

What is the Hotline?

- *The Hotline is an initiative reporting channel that allows individuals to report potential violations of the legislation, the Company's internal documents, principles of business ethics, and other unlawful actions.*

Who can contact the Hotline?

- *Reports can be submitted by a KPI employee, counterparty, partner, or any other person possessing information about a potential violation.*

What can be reported?

- *In particular, reports may concern: corruption and bribery, fraud, theft or abuse, conflicts of interest, violations of the Code of Corporate Ethics, violations of anti-corruption document requirements, unethical behavior, or other violations of legislation or KPI's internal documents.*

Can reports be made anonymously?

- *Yes. The option for anonymous reporting is determined by the respective reporting channel and applicable procedures. If you wish to remain anonymous, it is recommended to use a channel that supports this option.*

Is it necessary to have evidence of a violation?

- *No. A whistleblower is not required to independently establish the fact of a violation or conduct an investigation. It is important to provide the information known to you as accurately and conscientiously as possible.*

What should preferably be included in the report?

- *Where possible, please specify: what happened, when and where it occurred, who was involved, what circumstances are known to you, what documents or other information can confirm the facts, and how you can be contacted if you are willing to provide additional information.*

Where to contact right now?

JSC "Samruk-Kazyna" Hotline:

Tel: 8 800 080 47 47

WhatsApp: +7 771 191 88 16

Internet portal: www.sk-hotline.kz

Email: mail@sk-hotline.kz

KPI Compliance Service:

Email: compliance@kpi.kz,

Tel: +7 7122 31 52 22

FAQ — NOT SURE WHERE TO LOOK FOR THE ANSWER?

Choose a topic:

- **[Code of Corporate Ethics]**
Questions about employee behavior standards.
 - **[Counterparty Code of Business Ethics]**
Requirements for KPI's business partners.
 - **[Anti-Corruption]**
Key principles and prohibitions.
 - **[Anti-Corruption Instruction]**
Practical recommendations: gifts, conflicts of interest, business events, and other scenarios.
 - **[Hotline]**
How to report a potential violation and what happens after submitting a report.
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