

**Appendix 2 to the resolution of the Management Board
KPI Inc LLP
dated February 23, 2021
Minutes No. 03/21**

**ANTI-CORRUPTION POLICY
KPI INC LLP**

Atyrau, 2021

1. PURPOSE OF THE DOCUMENT AND GENERAL PROVISIONS

1.1. Kazakhstan Petrochemical Industries Inc. Limited Liability Partnership (hereinafter - KPI) believes that one of the most important conditions for sustainable business development is strict compliance with legislation regulating relations in the field of anti-corruption.

1.2. KPI declares categorical rejection of dishonest and illegal ways of doing business and voluntarily assumes additional obligations in the field of prevention and prevention of corruption recommended by Kazakh, foreign and international bodies and organizations.

1.3. The Anti-Corruption Policy of KPI Inc. LLP (hereinafter referred to as the Policy) discloses the goals and objectives of KPI in the field of countering involvement in corruption activities, defines the legal framework and key principles of this counteraction, describes the measures taken by KPI to prevent corruption, establishes the duties 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.

1.4. This Policy has been developed in order to:

- ensuring compliance of KPI's activities with the requirements of Kazakh and foreign legislation regulating relations in the field of anti-corruption, high standards of business ethics;
- minimizing the risks of involving KPI and its Employees in corrupt activities;
- formation of a unified idea of KPIs among Employees and Officials of KPIs, participants, investors, contractors, representatives of state bodies, and other interested persons as denying corruption in any of its forms and manifestations;
- creation of a local regulatory framework regulating the activities of KPI to counteract involvement in corruption.

1.5. The objectives of this Policy are:

- definition of the goals, objectives and principles of KPI in the field of combating corruption and fraud;
- prevention, detection, suppression and disclosure of illegal acts, as well as identification and identification of persons preparing, committing or committing them;
- identification of the main corruption and fraud risks and identification of measures to minimize and/or eliminate them;
- formation of corporate culture of KPI in order to counteract corruption and fraud;
- implementation of anti-corruption procedures in KPI based on applicable anti-corruption legislation and bringing them to KPI Employees and other interested parties;
- establishing the obligation of KPI Employees and Officials to comply with the principles, restrictions and requirements set out in the Policy;
- providing information channels for reporting corruption facts;
- explanation of the measures taken in the KPI to prevent corruption.

1.6. This Policy reflects KPI's commitment to high ethical standards of doing business and maintaining business reputation. KPI recognizes that its reputation as an honest and conscientious organization is one of its most valuable assets, considering that corruption poses a threat to its business and values. KPI's firm stance on anti-corruption is one of the fundamental principles of doing business.

1.7. KPI prohibits the commission of corruption offenses or bribery in any form, carried out directly or through the involvement of third parties (Mediation), throughout the world KPI openly declares its rejection of corruption and voluntarily assumes obligations in the field of prevention of corruption offenses.

1.8. KPI categorically prohibits KPI Employees and Officials from making Incentive Payments to Politically Significant Persons on behalf of KPI, including payments of such payments through intermediaries.

1.9. This Policy is posted on the official KPI website on the Internet and in the electronic document management system.

2. SCOPE OF APPLICATION

2.1. The policy is mandatory for all employees and Officials of KPI.

2.2. KPI recommends that its Contractors adhere to the requirements of this Policy and ensure that their employees comply with the requirements of the Policy.

3. DEFINITIONS AND ABBREVIATIONS

Active bribery	Offering, promising, permitting, or paying bribes (directly or indirectly), as well as aiding or abetting such behavior.
Close relatives	Parents (parent), children, adoptive parents, adopted , full and incomplete brothers and sisters, grandfather, grandmother, grandchildren.
Bribe ¹	Material values (objects or money) accepted by a politically significant person or any property benefit or services for an action (or, conversely, inaction) in the interests of the bribe taker, which this person could or should have committed by virtue of his official position.

¹ The term "Bribe" is used to denote the bribery of a civil servant, whereas it is customary to use the term "Commercial bribery" to denote the bribery of an employee of a commercial structure.

Officials	1) persons who, by virtue of a law, other legal act or document of KPI, are authorized to act on behalf of KPI; 2) members of the Supervisory Board and the Management Board of KPI.
KPI	Kazakhstan Petrochemical Industries Inc. Limited Liability Partnership
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 services to him for the use of his official position, as well as general patronage or connivance in the service in the interests of the person engaged in bribery.
Counterparty	A natural or legal person with whom KPI has concluded a contract or plans to conclude contract/agreement.
Conflict of interest	Any situations or circumstances in which the Personal benefit or activity of a KPI Employee or Official contradicts the interests of KPI or may potentially conflict with them and thereby may lead to improper performance of their official duties and affect the objectivity of decisions on issues related to KPI.
Corruption	Offer, promise, provision and obtaining illegal benefits, material and immaterial, in any form, directly or through intermediaries, including in the form of bribes and commercial bribery; and/or Mediation in the implementation of a corrupt action; and/or abuse of official position, abuse of authority, as well as other illegal use by an individual of his official position contrary to the legitimate interests of KPI, including for the purpose of obtaining illegal benefits, tangible and intangible, for yourself or third parties, or the illegal provision of such benefits to the specified person by other individuals.

Corruption offense	An unlawful guilty act (action or omission) that has signs of corruption, for which administrative or criminal liability is established by law.
KMG	National Company "KazMunaiGaz" Joint Stock Company
Passive bribery	Request, demand, consent to accept or receive a bribe, directly or indirectly.
A politically significant person	<p>1) A civil servant is a citizen of the Republic of Kazakhstan who, in accordance with the procedure established by the legislation of the Republic of Kazakhstan, holds a state position paid from the republican or local budgets or from the funds of the National Bank of the Republic of Kazakhstan in a state body and exercises official powers in order to implement the tasks and functions of the state;</p> <p>2) An official is a person who permanently, temporarily or by special authority performs the functions of a representative of the authorities or performs organizational and administrative or administrative-economic functions in state bodies;</p> <p>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 the international court of Justice, as well as officials in the armed forces and other military formations of a foreign state.</p>
Mediation in bribery / commercial bribery	Direct transfer of a bribe/the subject of Commercial bribery (illegal remuneration) on behalf of the bribe-giver/the person transferring the subject of commercial bribery, or the bribe-taker/the person receiving the subject of commercial bribery, or other assistance to the bribe-giver and (or) the bribe-taker/ participating persons in achieving or implementing an agreement between them on receiving and giving a bribe/commercial bribery.
Anti-corruption	Activities of Employees and Officials of KPI to prevent (prevent) corruption

	and combatting corruption (investigation of corruption offences).
Prevention of risks of corruption activities	Activities aimed at introducing elements of corporate cultures, organizational structures, rules and procedures regulated by internal documents, providing prevention of corruption offenses in KPI.
Employee	A person who is in an employment relationship with KPI and directly performs work under an employment contract, as well as other persons involved in a contract through agencies and a contract of a civil nature.
Relatives	Brothers, sisters, parents and children of the spouse.
KPI Compliance Service	Responsible structural unit or KPI Employee responsible for compliance issues.
Stimulating payments	Payments in favor of Politically significant persons in order to accelerate routine official actions (for example, the issuance of permits, licenses or other official documentation; issuance of visas, work permits and other immigration documentation; acceleration of obtaining permission to release goods from customs; acceleration of state registration of real estate or vehicles; acceleration in the provision of utilities or other services (for example, telecommunications, security) and so on.

4. RESPONSIBILITY

4.1. Employees/Officials of KPI in the performance of their official duties must:

1) familiarize yourself with the Policy and sign a commitment to comply with the Policy. The obligation is made out in the form of an appendix to the employment contract in the form according to Appendix No. 1 to the Policy;

2) be guided by the memo, according to Appendix No. 2, which lists the basic concepts and examples of unacceptable corrupt behavior;

3) take into account compliance with the Policy when assessing the business qualities of an Employee, including in the case of his appointment to a higher position, solving other personnel issues;

4) strictly comply with the restrictions and requirements stipulated by the Policy, including those related to giving, receiving gifts; carrying out representative expenses, charitable and sponsorship activities; participation in political activities; interaction with representatives of the state, politically significant persons and public organizations, with

Contractors, intermediaries, third parties; prevention of conflicts of interest; reporting;

5) strictly observe the categorical prohibition on the following actions:

- to participate in corrupt actions, including not offering, promising, or giving bribes to Politically significant persons;

- asking for and receiving bribes (Commercial bribery);

- participate in Commercial bribery of Contractors or Contractors to Employees/Officials;

- to 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 a property and non-property nature, to any persons and from any persons or organizations, including commercial and non-profit organizations, authorities and local authorities self-government, politically significant persons, in order to obtain benefits for themselves, for KPIs or for third parties.

6) KPI officials in the performance of their official duties must strictly comply with the categorical prohibition on requests and receiving bribes from KPI Counterparties and other third parties;

7) comply with the requirements and restrictions of an anti-corruption nature established by other internal documents of the KPI (in the part that does not contradict the Policy).

4.2. KPI employees/Officials, when interacting with Counterparties, must:

1) establish and maintain business relations with those Counterparties that conduct business relations on a fair and honest basis, take care of their own reputation, demonstrate support for high ethical standards in conducting business, implement their own anti-corruption measures.

4.3. The Compliance Service is responsible for:

1) implementation of the Counterparty verification procedure in order to reduce the risk of KPI involvement in corruption and other unfair practices in the course of relations with Counterparties (including the collection and analysis of publicly available information about potential Counterparties, such as their reputation, duration of activity in the market, participation in corruption scandals, etc.).

2) posting on the official KPI website of information on corruption prevention measures taken at KPI;

3) updating the Policy;

4) organization of training in the provisions of the Policy.

4.4. The Legal Support Department is responsible for the inclusion in contracts concluded with Counterparties of provisions on compliance with anti-corruption standards - an anti-corruption clause in the form provided for in Annex No. 3.

5. REGULATORY FRAMEWORK

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

5.2. When drawing up this Policy, the contents of the following documents were taken into account:

- The United Nations Convention against Corruption (adopted in New York (USA) at the plenary session of the 58th session of the UN General Assembly on October 31, 2003, ratified by the Law of the Republic of Kazakhstan dated May 4, 2008 N31-IV);

- The UK Anti-Bribery Act (UK Bribery Act 2010), which came into force on July 1, 2011.;

- Criminal Code of the Republic of Kazakhstan dated July 3, 2014;

- Law of the Republic of Kazakhstan dated November 18, 2015 "On combating corruption";

- KPI Code of Business Ethics;

- KPI Employees' and Officials' Conflict of Interest Resolution Policy;

5.3. The main requirements of these acts in the part concerning commercial

organizations are:

- prohibition of giving bribes or the subject of commercial bribery;
- prohibition of bribery of politically significant persons;
- prohibition of Mediation;
- prohibition of receiving bribes or the subject of Commercial bribery.

6. KEY PRINCIPLES OF ANTI-CORRUPTION

As part of its activities, KPI is guided by the following anti-corruption principles:

6.1. the principle of "zero tolerance" (non-acceptance of corruption in any forms and manifestations) is a complete ban for Employees and Officials of KPI, as well as other persons acting on behalf of KPI and/or in its interests, directly or indirectly, personally or through any Mediation, to participate in corrupt actions regardless of the practice of conducting business in a particular country;

6.2. the principle of "Tone from above" - KPI officials by their behavior set an example for KPI Employees to comply with and promote high ethical standards of doing business and non-acceptance of corruption in any of its manifestations;

6.3. the principle of due diligence is the adoption of a set of measures and actions aimed at obtaining the necessary and reliable information about the Counterparty to minimize the risk of business relations with Counterparties who may be involved in corrupt activities or tolerant of corruption;

6.4. the principle of corruption prevention — KPI takes preventive measures in advance to prevent corruption, i.e. the introduction of 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 - KPI declares an irreconcilable attitude to any forms and manifestations of fraud and corruption at all levels of corporate governance. Bringing the guilty persons to justice is carried out, regardless of their position and term of work in KPI and other relationships with him in accordance with the procedure established by the legislation and internal documents of KPI;

6.6. monitoring and control - KPI monitors the implemented procedures for preventing and combating corruption, monitors their compliance and regularly improves them;

6.7. cooperation in the field of anti-corruption - KPI recognizes the general social nature of the problem of corruption and the need to counter it both through measures implemented within the framework of state policy and through the formation of intolerance to corruption on the part of Employees, KPI Officials and KPI Counterparties;

6.8. involvement of employees in combating corruption - KPI aims to form a personal position of non-acceptance of corruption by Employees in any of its forms and manifestations. To this end, KPI takes all necessary measures to implement the Policy at all levels of the organization and bring its content to the attention of its Employees, as well as other interested parties. KPI contributes to the improvement of the level of anti-corruption culture of Employees through their regular training in the basic requirements of the Policy and its application in practice;

6.9. the principle of maintaining reliable reporting - the KPI strictly complies with the requirements of legislation and the rules for maintaining accounting documentation. Each fact of economic life is subject to registration with 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 THE RISKS OF CORRUPTION ACTIONS

7.1. Information and training

In order to form an appropriate level of corporate culture with newly hired KPI Employees/KPI Officials involved in processes exposed to corruption risk, introductory training is conducted on the provisions of this Policy and related documents; for Employees working in KPI/Officials are given periodic informational trainings in full-time and/or remotely.

KPI employees/Officials are trained full-time in the form of trainings, as well as in correspondence or distance form by familiarizing themselves with this Policy, which is publicly available on the KPI website and on internal resources.

7.2. Verification of KPI counterparties and applicants

Before making a decision on starting or continuing a business relationship, when attracting job seekers, when participating in legal entities, when interacting with Contractors and other interested parties, KPI checks their reliability, absence of Conflicts of interest, relationship with Politically significant persons, analyzes information about reputation.

The procedure for checking applicants for compliance with the requirements established, including this Policy, is carried out in accordance with the internal documents of the KPI.

7.3. Accounting and auditing

In order to ensure the availability of information for all interested parties, KPI conducts accounting, tax and management accounting in full compliance with the requirements of legislation and internal regulatory documents.

All financial and economic transactions are reflected in accounting and other types of accounting, taking into account the principles of completeness, reliability and openness.

KPI does not allow the implementation of business transactions without their reflection in accounting, distortion or falsification of accounting, management and other types of accounting data or supporting documents.

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

Accounting and reporting are subject to regular internal and external audits in accordance with the requirements of legislation and internal KPI documents.

7.4. Implementation of representation expenses and gift giving

Receiving or giving gifts, showing hospitality are a sign of respect and politeness, form good business relationships, provided that they are symbolic in nature, comply with business practices, do not create reputational risk for KPIs, do not represent a hidden reward, are not designed to influence decision-making and do not give others a reason to see such influence.

If, in the opinion of an Employee, accepting a gift or an invitation to a business dinner/lunch has led to expectations of receiving unreasonable benefits from a Counterparty or a third party, he needs to inform his immediate supervisor, Compliance Service or Hotline about this.

Officials are not entitled to receive gifts or accept invitations to a business lunch/dinner at the expense of the Counterparty.

Officials/Employees are not entitled to provide or receive money, gifts, hospitality, or any valuables from a Politically Significant Person. The exception is events where Politically

significant persons are invited to present medals to veterans, to congratulate KPI Employees, to the grand openings of production facilities, as well as to state and national holidays, as well as to other business meetings to discuss the interaction between KPI and these Politically significant persons. At the same time, within the framework of these events/meetings, a Politically significant person will not be given preferences relative to other invited persons.

All expenses for gifts and representative expenses must be correctly and reliably recorded in expense reports, as well as in the register of gifts and hospitality signs in accordance with the requirements of internal KPI documents.

Giving and receiving gifts, as well as representation expenses are carried out in accordance with the Code of Business Ethics and other internal documents of the KPI.

7.5. Restrictions on the implementation of charitable and sponsorship activities

KPI does not directly provide charitable and sponsorship assistance to government agencies, commercial and non-profit organizations, their representatives, as well as other persons.

Charitable and sponsorship assistance can be provided by KPI only by:

- transfers of funds to the Fund for the Development of Social Projects "Samruk-Kazyna Trust";
- write-off of obsolete assets for charitable purposes (can be carried out in agreement with the KPI Compliance Service and, if necessary, KMG);
- assistance to low-income families at the request of local executive bodies (can be carried out in coordination with the KPI Compliance Service and, if necessary, KMG).

An exception to the above may be the corresponding order of JSC "Samruk-Kazyna". In this case, charitable and sponsorship assistance can be provided for specific purposes, followed by a detailed report on the targeted expenditure of funds.

7.6. Refusal to participate in political activities

KPI does not participate directly or indirectly in political parties, organizations and foundations associated with them, including does not make sponsorship and other payments in support of them.

Employees and Officials of KPI have the right to participate in political activities at their discretion as individuals in their free time, provided that such participation does not harm the interests of KPI and does not create a Conflict of interests.

7.7. Bringing to justice for committing corrupt actions

KPI makes all possible reasonable and legitimate efforts to quickly and inevitably bring to justice for corruption actions and other violations of the requirements of anti-corruption legislation and internal documents in the field of combating corruption, regardless of the size and form of such violations.

KPI reserves the right, in accordance with the established procedure, to make public information about persons held accountable for committing corruption offenses established by this Policy.

7.8. Refusal to retaliate

KPI guarantees that KPI Employees/Officials will not be brought to disciplinary responsibility who refused to commit a corruption offense, even if as a result of such refusal KPI did not receive additional tangible and intangible benefits, suffered losses that could only be avoided by violating the requirements of legislation or this Policy.

KPI considers it unacceptable and strives to promptly identify and prevent retaliatory measures against KPI Employees/Officials who have reported in good faith about the alleged fact of a corruption offense committed by another Employee/An official of the KPI, even if

such a suspicion has not been confirmed.

This Policy is a key link in the system of promoting ethical norms and principles in KPI and calls for building relationships with colleagues and external stakeholders based on honesty and trust, striving to avoid actions that can harm both the reputation of KPI and others.

7.9. "Hotline"

In order to maintain a high level of trust in KPI, compliance with international standards of business ethics, as well as prevention and suppression of fraud and corruption, a Hotline operates in KPI.

By contacting the Hotline, any person can, in a form convenient for him, including on condition of anonymity, report the facts of embezzlement and embezzlement in KPI, fraud, bribery, Commercial bribery, Conflict of interest, other manifestations of corruption and violations of the Policy provisions that have become known to him.

Each appeal is carefully considered, the results of consideration of the appeal are brought to the attention of the responsible persons of the KPI, if there are grounds, an appropriate check is carried out in accordance with the internal documents and procedures of the KPI. The Hotline contacts are posted on the official KPI website on the Internet, on information stands and in other publicly accessible places.

7.10. Interactions with law enforcement agencies

KPI undertakes to report to the relevant law enforcement agencies about corruption offenses that KPI has become aware of.

Interaction with law enforcement agencies on the part of KPI Employees is possible in the following forms:

- informing law enforcement agencies about cases of violations with signs of corruption and fraud;
- assistance to law enforcement agencies in carrying out measures to curb or investigate corruption;
- providing answers / participation in meetings (meetings) at the request of law enforcement agencies on the prevention and combating of corruption

7.11. Anti-corruption restrictions and declaration of income and property

In order to prevent persons equated to persons authorized to perform state 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-official interests, these persons assume anti-corruption restrictions on:

- (a) inadmissibility of joint service (work) of close relatives, spouses and relatives;
- (b) the use of official and other information that is not subject to official dissemination in order to obtain or extract property and non-property benefits and advantages;
- (in) acceptance of gifts in connection with the performance of official duties in accordance with the legislation of the Republic of Kazakhstan, except for cases established by the laws of the Republic of Kazakhstan.

The consent of these persons to the adoption of anti-corruption restrictions is recorded in writing.

Failure to accept anti-corruption restrictions by these persons entails refusal to accept a position or dismissal from office (dismissal from office), their non-compliance in cases of absence of signs of a criminal offense and an administrative offense is the basis for termination of their respective activities.

Persons who are candidates for a position related to the performance of state or equivalent functions, as well as their spouses, submit a declaration of income and property to

the state revenue body at the place of residence in accordance with the legislation of the Republic of Kazakhstan.

Failure to submit or submit incomplete, unreliable declarations and information, if the act does not contain signs of a criminally punishable act, is the basis for refusing to empower a person with appropriate powers or entails disciplinary responsibility in accordance with the procedure provided for by law.

8. INTERACTION WITH POLITICALLY IMPORTANT PERSONS AND THE PUBLIC

KPI believes that any dialogue and interaction with Politically important persons should be based on an initiative, honest, transparent, responsible and consistent approach and comply with applicable legislation and business ethics standards.

Any improper interaction of a KPI Employee/Official with Politically exposed persons is strictly prohibited.

KPI refrains from any payments in favor of Politically Significant Persons, as well as their Close relatives, spouses, Relatives or payments in the interests of these persons, including receiving material or other benefits from KPI with the direct or indirect purpose of obtaining any unlawful advantages or preferences, including:

- organization or payment (compensation) of participation in representative events;
- organization or payment (compensation) of rest, treatment and prevention of diseases;
- organization or payment (compensation) of travel and other expenses.

In the case of organizing an event at the expense of KPI funds with the participation of Politically significant persons, the initiator of such an event must obtain prior approval of this event from the KPI Compliance Service. At the same time, Representative expenses should not exceed the limits on representative expenses determined by JSC "Samruk-Kazyna", or the limits established by law.

KPI employees/Officials are prohibited from directly or through intermediaries to offer, transfer, promise, certify the transfer of funds, any other valuables or material, or other benefits to Politically significant persons in exchange or for the purpose of obtaining illegal advantages or preferences.

KPI employees/Officials are prohibited from offering, transferring or promising any Incentive Payments directly or through intermediaries to Politically Significant Persons.

Employees/Officials of KPI are obliged to prevent behavior that can be perceived by Politically significant persons as a willingness to commit or contribute to the commission of corrupt actions. These requirements apply to all cases of interaction, including oral and written appeals, negotiations.

An employee/Official of KPI who has received information from Politically significant persons that can be perceived as a request, demand, extortion, hint at the transfer of funds, any other valuables, material or other benefits in his favor or in favor of his Close relatives, spouses, Relatives is obliged to suspend business contacts with the relevant Politically significant a person and within 1 (one) business day notify the KPI Compliance Service of the presence of such a situation and/or send information about it to the Hotline.

The conclusion of contracts with Politically significant persons, their Close relatives, spouses, Relatives is a factor of high corruption risk. To eliminate such a risk, KPI checks potential Employees and Contractors for connection with Politically significant persons in accordance with internal documents.

In case of any kind of doubts about the legality or ethics of their actions, KPI Employees/ Officials are obliged to consult with the KPI Compliance Service.

9. CORRUPTION RISK ASSESSMENT AND MANAGEMENT

The approach to identifying and assessing corruption risks should be organized in such a way as to ensure timely and effective management of these risks.

KPI corruption risk assessment is carried out to identify specific business processes that are most susceptible to corruption offenses by Employees, KPI Officials, Contractors and other third parties cooperating with KPI.

The KPI establishes the following procedure for assessing corruption risks:

- presentation of KPI activities in the form of separate business processes;
- identification of "critical" points and directions for each business process that are most likely to be subject to corruption and other offenses;
- description of possible corruption offenses: characteristics of benefits in the commission of a corruption offense, probable forms of bribery or Commercial bribery.

Corruption risk management is carried out as follows:

- preparation of KPI corruption risk maps, including evaluation of results and reporting on the activities carried out;
- establishment of special anti-corruption procedures, including regular filling out of Conflict of interest notices in accordance with internal documents;
- analysis of the effectiveness of existing anti-corruption measures;
- development (revision) of new and improvement of existing anti-corruption measures.

Corruption risk assessment is carried out during the development and implementation of this Policy; after the approval of the Policy - at least once every two years.

Periodic analysis of the effectiveness of the existing anti-corruption system is carried out within the framework of audits of the KPI Internal Audit Service, as well as within the framework of independent audits by external consultants (auditors).

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

The responsibility for compliance with the requirements of this Policy lies with every Employee/Official of KPI, regardless of their position.

Commission by an Employee/An official of the KPI of corruption offenses and/or fraudulent actions is recognized as a gross violation of labor duties.

An employee/official of KPI, regardless of the status and position, is subject to liability. Prosecution is carried out in accordance with the legislation of the Republic of Kazakhstan.

In case of identification and establishment of involvement of a KPI Employee/Official in the commission of corruption offenses and/or fraudulent actions, KPI has the right to bring a KPI Employee/Official 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.

If there are sufficient grounds, the materials of the internal investigation on the above facts are transferred to law enforcement agencies with a statement on bringing the perpetrators to administrative or criminal responsibility.

In case KPI causes harm and damage, KPI reserves the right to apply to the court with a civil claim against the person who committed corruption offenses and/or fraudulent actions.

11. FINAL PROVISIONS

In order to comply with international standards of business ethics, openness and

transparency of doing business, KPI Employees/Officials must notify the KPI Compliance Service of all cases of their inducement to commit corruption offenses, in accordance with KPI internal documents.

In case of doubts about the legality of the actions of other Employees/Officials of KPI or Counterparties, possible corrupt actions and other violations, including embezzlement, fraud, bribery, Commercial bribery, Conflict of Interest, etc., an employee /Official of KPI, Counterparty, participant or other person may, in the form of an open dialogue (including anonymously), report their doubts to the KPI Compliance Service or contact The "hotline" in accordance with the procedure established by the internal documents of the KPI.

**Appendix to the
Employment Contract**

**OBLIGATION TO COMPLY WITH THE ANTI-CORRUPTION POLICY IN
KPI INC. LLP.**

1. The employee confirms that he has read the contents of the Anti-Corruption Policy in KPI Inc. LLP and the Code of Business Ethics of KPI Inc. LLP and undertakes to comply with them.

2. The employee undertakes:

2.1. Not to participate in corrupt actions directly or indirectly, personally or through the Mediation of third parties, including not to offer, give, promise, ask or receive Bribes and facilitation payments in any form (Incentive payments), including in the form of cash, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, government and self-government bodies, Kazakh 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 KPI.

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

- about cases of inducing an Employee to commit corruption offenses;
- about information that has become known to the Employee about cases of corruption offenses committed by other Employees, KPI Contractors or other persons;
- about the possibility of a conflict of interest arising or arising from the Employee.

3. The employee got acquainted with the opportunity to inform the KPI Hotline, the KPI Compliance Service responsible for monitoring compliance with the Policy, about the existing suspicions about the legality or ethics of their actions, as well as actions, inaction or proposals of other Employees, Contractors or other persons who interact with the Company.

4. It is explained to the Employee that no KPI Employee, including him, will be sanctioned and prosecuted by KPI if he reported the alleged fact of corruption, or if he refused to give or receive a Bribe, commit Commercial Bribery or in any other way mediate bribery, including as a result of such refusal from KPI there was a lost profit or commercial and competitive advantages were not obtained.

5. The employee has been warned about the possibility of being brought to disciplinary, administrative, civil and/or criminal liability for violating the anti-corruption requirements of Kazakhstan and other applicable legislation, as well as the Anti-Corruption Policy and the Code of Business Ethics of KPI Inc. LLP.

6. It was explained to the employee that if he has additional questions about the principles and requirements of the Anti-Corruption Policy in KPI Inc. LLP and the applicable anti-corruption legislation, he can contact the KPI Compliance Service responsible for monitoring compliance with the Policy.

MEMO OF AN EMPLOYEE OF KPI Inc LLP ON COMPLIANCE WITH THE REQUIREMENTS OF ANTI-CORRUPTION LEGISLATION

1. *What kind of behavior is prohibited?*

The policy of KPI Inc. LLP (hereinafter referred to as KPI) in the field of combating corruption in KPI (hereinafter referred to as the Policy) prohibits any form of corruption: abuse of official position, Bribery (Active Bribery), taking a bribe (Passive Bribery), Mediation, abuse of authority, Commercial Bribery or other illegal use by an individual of his official position contrary to the interests of the KPI and the state, to obtain benefits in the form of money, valuables, other property or services of a proprietary nature, other property rights for oneself or third parties, or the illegal provision of such benefits 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 accepted material values (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 committed 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):

- financial payments or promises of payments in cash or cash equivalents (for example, gift certificates),
- gifts, entertainment and hospitality tokens (for example, travel, meals and accommodation),
- services,
- loans and valuable collateral,
- property or any share in property of any kind,
- protection from penalties and exemption from any obligation,
- anything provided for inappropriate remuneration,
- the provision of practice, work experience or the offer of temporary or permanent work (including the provision of the same services/ benefits to Close relatives, spouses, Relatives),
- political or charitable contributions.

Proof that a Bribe is a necessary measure in any local industry, business, profession or vocation cannot be used in defense of bribery.

3. *Active bribery*

For Employees/KPI officials are always unacceptable:

- offer, promise or pay bribes, including Incentive payments, other illegal payments or benefits to a Politically significant person or in their favor, or at the direction of such persons;
- facilitate, mediate, assist, or support such behavior.

A violation of the Policy occurs if a KPI Employee/Official offers, tries to pay or pays, is an intermediary in giving a bribe to a Politically significant person, even if the KPI Employee/Official does not receive benefits in return.

4. *Passive bribery*

KPI employees/Officials are prohibited from:

- to ask, demand, agree to receive or receive a bribe from a Politically significant person.

This prohibition applies regardless of whether the Employee receives a bribe in his own favor or on behalf of another person.

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

5. *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 property-related services to him for the use of his official position, as well as general patronage or connivance in the service in the interests of the person engaged in bribery.

6. *When is an advantage considered a bribe or a commercial bribe?*

Giving an advantage is a Bribe, regardless of the value, if there is an intention:

- encourage or encourage inappropriate behavior on the part of the recipient or another person (Commercial bribery); or
- influence a politically significant person (illegally or otherwise) in the performance of their official duties in order to obtain or retain a commercial advantage.

Giving an advantage is probably a Bribe if:

- it is illegal under the relevant anti-corruption and bribery laws;
- it creates an obligation or the appearance of an obligation for the other party;
- it is intended to persuade a person to act or inaction in order to provide a certain benefit or general support to the person providing the advantage or the organization of such a person;
- it is provided to a Politically significant person to influence an employee in relation to his official duties, to accelerate the performance of official duties or to receive general support from such a person;
- it is unreasonable in terms of cost, frequency or method of provision.

7. *What else is forbidden?*

It is also unacceptable for you:

- violate financial discipline, including criminal acts such as theft of funds and making false reports, insider trading, money laundering or misappropriation of funds;
- to use or offer privately to other persons access to or use of the Company's resources, including assets, funds or intellectual property, without prior permission from the Company;
- attempt to persuade an individual employee of a commercial organization, a state (fully or partially) organization, or a politically significant person to illegal actions;
- offer, give or allow bribes/Commercial bribery, directly or indirectly, through an agent

or an associate:

- a. A politically significant person, or
- b. to a manager, employee or employee of a commercial or other organization;
 - to offer or provide an unauthorized benefit (property or other) to an employee of any competitor, supplier or customer of the Company, which may lead to unfair competitive advantage and violation of applicable competition regulations, such as any benefit that may lead to an improper advantage of the Company over its competitors;
 - use any connections that you may have with Politically exposed persons for the purpose of illegally obtaining a competitive advantage in relation to KPIs;
 - do not report signs of illegal payments or tokens of attention in accordance with the Policy or any circumstances giving grounds to suspect such behavior;
 - take actions, including fraudulent false statements, inciting a party to obtain financial or other benefits, or to evade obligations;
 - attempt to conceal or conceal any of the above.

I have read the *memo, everything has been read and explained in full.*

Full name _____

Signature

Date

EXAMPLE OF AN ANTI-CORRUPTION CLAUSE FOR CONTRACTS WITH COUNTERPARTIES

1. [Name of the counterparty under the agreement] undertakes to ensure that all individuals and legal entities affiliated with it acting under this agreement (hereinafter each of them is referred to as an "Affiliate"), including without limitation owners, directors, officers, employees and agents of [Name of the counterparty under the agreement], comply with the guarantees of this clause.

2. [Name of the counterparty under the contract] and all Affiliated Persons undertake not to perform, directly or indirectly, the following actions:

2.2.1. To pay, offer, promise or allow to pay any money or provide other valuables (including gifts, entertainment and subsidies) to any persons associated with the state for the purpose of illegally obtaining, maintaining or conducting business or obtaining illegal benefits for KPI.

2.2.2. Not to commit other actions that violate existing laws prohibiting bribery in the field of commerce, including Commercial bribery and other illegal and illegal means of doing business.

3. [Name of the counterparty under the contract] [is not] a ²person associated with the state, and [does not have] ³Politically significant persons who are its officials, employees, or direct or indirect owners. [Name of the counterparty under the contract] undertakes to immediately inform KPI in writing of all cases when any Politically significant person becomes an official or employee of [Name of the counterparty under the contract] or acquires a direct or indirect interest in [Name of the counterparty under the contract].

4. [Name of the counterparty under the contract] was created for the purpose of carrying out legitimate economic activities, and not for any illegal purposes and has only legitimate sources of financing.

5. [Name of the counterparty under the contract] and its Affiliated Persons have not been convicted of committing or found guilty of committing any illegal actions related to fraud or corruption. [Name of the counterparty under the contract] undertakes to immediately inform KPI in writing if [Name of the counterparty under the contract] or any of its Affiliates are convicted of committing or found guilty of committing such illegal actions.

6. [Name of the counterparty under the contract] confirms that he has read the Code of Business Ethics of KPI Inc. LLP (hereinafter - KPI) and the KPI Anti-Corruption Policy on the official KPI website. [Name of the counterparty under the contract] certifies that he fully understands the KPI Code of Business Ethics and the KPI Anti-Corruption Policy.

7. [Name of the counterparty under the contract] undertakes to provide KPI with assistance and assistance in good faith in the event of a valid or possible violation of the requirements of this Anti-Corruption Clause, including undertakes to ensure the possibility of conducting a survey of its owners, directors, officers and other Affiliated Persons.

8. [Name of the counterparty under the contract] undertakes to promptly notify KPI of

² It is necessary to change the text if the Counterparty is a person associated with the state

³ If available, it is necessary to change the text and obtain a list of public officials

all cases of violation of the requirements of the anti-corruption clause related to the activities of KPI. To report cases of violation of the requirements, [Name of the counterparty under the contract] is obliged to use the KPI Hotline, information about which is posted on the official KPI website.