

**Approved by [Order](#)
of the General Director
(Chairman of the Management Board)
KazTransOil JSC
dated June 26, 2017 No. 111**

Anti-Corruption Standards «KazTransOil» JSC

1. The Anti-Corruption Standards of KazTransOil JSC (the Company) have been developed in accordance with the requirements [of the Law](#) of the Republic of Kazakhstan on "Combating Corruption" and are aimed at achieving an atmosphere of intolerance to any manifestations of corruption among employees by creating value and moral guidelines.

2. The Company's employees are recommended the following:

1) when exercising their rights and legitimate interests to:

resist any manifestations of corruption, prevent corruption offenses, stop the facts of corruption offenses on the part of other employees;

according to reliable information about a corruption offense, take all necessary measures to prevent and terminate such an offense;

form a legal culture based on the principles of legality, honesty, integrity and transparency in the performance of their official duties;

upon unfounded public accusation of corruption, within a month from the date of discovery of such an accusation, take measures to refute it;

2) when preparing and making managerial and other decisions within its competence:

prevent actions (inaction) that make it difficult for individuals and/or legal entities to exercise their rights, freedoms and legitimate interests. If such facts are revealed, take the necessary measures to eliminate them;

not to give preference to individuals and legal entities, to be independent of their influence in the performance of official duties;

use all opportunities to prevent the occurrence of events that may have a negative impact on the Company's activities;

prevent the initiation of inspections in the personal interests and interests of third parties;

not to use official powers and related opportunities to obtain personal property and non-property benefits;

take measures to prevent a conflict of interest, and in case of a conflict of interest, take measures to resolve it in accordance with the legislation of the Republic of Kazakhstan and/or the Policy on Conflict of Interest Resolution of Officials and Employees of KazTransOil JSC;

3) when preparing drafts of internal documents of the Company:

exclude the creation of conditions conducive to the commission of corruption offenses;

analyze internal documents in order to identify corruption-causing factors that create prerequisites for employees to commit illegal actions of a corrupt and other illegal nature and to reflect appropriate preventive measures in them;

4) in case of other relationships arising in the exercise of duties:

managers in relations with subordinate employees are recommended:

serve as an example of impartiality, justice, selflessness, honesty and integrity by their behavior;

ensure compliance with the principles of meritocracy, when solving personnel issues, not to give preference on the grounds of kinship, fraternity and personal devotion;

show fairness and objectivity in assessing the results of their activities, as well as in the application of incentives and penalties;

not to use the official position to influence their work when solving issues of an out-of-work nature;

prevent an uneven distribution of the workload between the Company's subordinate employees;

not to force to commit illegal acts, as well as acts that are incompatible with generally accepted moral and ethical norms.

Subordinates in relations with managers are recommended:

when executing orders, provide only objective and reliable information, immediately inform management about cases of corruption in the actions of other employees/third parties that have become known to them;

do not allow personal loyalty to the leadership, the desire to obtain benefits and advantages at the expense of their official capabilities.

3. The Company's employees are obliged to comply with the restrictions and prohibitions established by the legislation of the Republic of Kazakhstan and/or internal documents of the Company on:

1) implementation of activities limited by the legislation of the Republic of Kazakhstan;

2) inadmissibility of joint work of close relatives, spouses and relatives;

3) the use of official and other information that is not subject to dissemination in order to obtain or extract property and non-property benefits and advantages;

4) acceptance of gifts in connection with the performance of official duties*.

The Anti-corruption Standard was supplemented by Clause 4 in accordance with the [Order of the acting General Director \(Chairman of the Management Board\) of KazTransOil JSC dated 11.02.22 No. 9](#)

4. The General Director (Chairman of the Management Board) of the Company shall bear disciplinary responsibility for the commission of corruption crimes by employees directly subordinate to General Director in accordance with [Policy](#) of KazTransOil JSC on combating corruption.

*Restrictions on giving and receiving gifts are set [by the Code](#) of Corporate Ethics of KazTransOil JSC approved by resolution of the Company's Board of Directors dated March 10, 2010 (Minutes No. 3/2010)