



KazTransOil JSC

Name of the ISM document:

Anti-Corruption Policy of KazTransOil JSC
(with additions as of 10.02.2022)

Policy

Prepared by:
corporate security department

Approved by the decision of the Board of
KazTransOil JSC
dated May 20, 2020 (Minutes of the meeting
No. 12)

The Policy was amended in accordance with the resolution of the Board of KazTransOil JSC, minutes of the meeting dated 10.02.22 No. 5 (see last. ed.)

KazTransOil JSC (hereinafter referred to as the Company), being the national operator of the trunk oil pipeline, imposes requirements for the prevention of corruption offenses, the formation of zero tolerance for corruption in order to ensure compliance of the Company's activities with the requirements of the legislation of the Republic of Kazakhstan in the field of anti-corruption.

This Policy reflects the Company's commitment to high ethical standards of doing business and maintaining business reputation. The Company 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. The firm position of the Company in relation to combating corruption is one of the fundamental principles of doing business.

To implement this Policy, the Company's management assumes the following obligations:

- 1) comply with the requirements of the legislation of the Republic of Kazakhstan, internal documents of the Company in the field of anti-corruption;
- 2) eliminate the causes and conditions that give rise to corruption, minimize the risks of involving the Company's employees in corrupt activities;
- 3) increase the anti-corruption culture of the Company's employees;
- 4) require compliance with the legislation of the Republic of Kazakhstan in the field of anti-corruption in relations with counterparties;
- 5) form a unified idea of the Company among employees, officials of the Company, shareholders, counterparties and other interested persons as an organization that denies corruption in any of its forms and manifestations.

The obligations expressed in this Policy are the basis for setting anti-corruption goals, apply to all structural divisions of the Company and are included in the system of business relations of the Company with partners.

The management of the Company is responsible for the implementation of this Policy and the provision of all necessary resources.

The General Director (Chairman of the Management Board) of the Company bears disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan for non-performance or improper performance of official duties to prevent the commission of corruption offenses by subordinate employees.

The General Director (Chairman of the Management Board) of the Company bears disciplinary responsibility for the commission of corruption crimes by employees directly subordinate to him under the combination of the following conditions:

- 1) a connection has been established between a corruption crime committed by a subordinate and the guilt of non-fulfillment or improper performance of official duties to prevent the commission of corruption offenses;

2) in relation to a subordinate employee, there is a judicial act that has entered into legal force on bringing to criminal responsibility for a corruption crime, or a criminal case for committing a corruption crime has been terminated by a criminal prosecution body or a court on the basis of paragraphs 3), 4), 9), 10), 11) and 12) part one of [article 35](#) or [article 36](#) of the Criminal Procedure Code of the Republic of Kazakhstan.