

 KazTransOil	KazTransOil JSC
Name of the IMS document:	Code of Business Ethics of KazTransOil JSC
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Developer: Human Resources Management Department	Approved by resolution of the Board of Directors of KazTransOil JSC (Minutes No. 12/2020 as of December 10, 2020)

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1. GENERAL PROVISIONS

1. This Code of Business Ethics of KazTransOil JSC (hereinafter referred to as the Code) enshrines the corporate values of KazTransOil JSC (hereinafter referred to as the Company), defines the most important principles, rules of business conduct and effective interaction with stakeholders, and is a set of corporate ethics requirements that guide all officials and employees of the Company on the basis of compliance with ethical norms of the legislation of the Republic

of Kazakhstan and those states whereon the Company's business units are located (hereinafter referred to as legislation).

2. The Code has been developed in accordance with the requirements of legislation, internal documents of the Company, including the [Charter \[1\]](#), the Corporate Governance [Code \[2\]](#), as well as recognized international norms and practices of business conduct and corporate governance.

3. If certain provisions of the Code come into conflict with the legislation, the provisions of the legislation shall apply. If certain provisions of the Code come into conflict with traditions, customs or someone's personal ideas about the relevant rules of conduct, the provisions of the Code apply.

4. The Code accepts, promotes compliance with and does not contradict the provisions of the Code of Business Ethics of NC KazMunayGas JSC, which is a major shareholder of the Company. The Company accepts the provisions of the Code of Business Ethics of NC KazMunayGas JSC in proportion to its compliance risks.

5. The purpose of the Code is to consolidate common corporate values, develop corporate culture and promote effective interaction of the Company with stakeholders through the application of business conduct practices.

6. The Code is an open document and is freely distributed among concerned parties.

2. SCOPE

7. The provisions of the Code apply to all officials and employees of the Company.

All requirements and provisions of the Code in relation to employees also apply to persons performing work in the Company in accordance with the Personnel Services Provision Contract.

8. Officials and employees of the Company are obliged to familiarize themselves with the Code, accept its terms and conditions with the signing of the corresponding obligation in accordance with [Annex 1](#) to the Code. The obligations of the members of the Company's Board of Directors are kept in the service of the Corporate Secretary of the Company, employees of the Company - in their personal files, persons performing work in the Company in accordance with the contract for the provision of personnel services - in the personnel service.

9. The Company, its officials and employees adopt, continuously and strictly follow the provisions of the Code when making decisions at all official levels, in relations with all stakeholders and the public as a whole, both when making strategic decisions and when performing daily work.

10. On the basis of the provisions of the Code, without changing, but having the opportunity to supplement these provisions, subsidiaries and jointly controlled organizations of the Company may develop and approve similar own codes.

11. The Code, in the part that does not contradict the essence of the existing obligations, has a recommendatory character for all interested parties of the Company, including suppliers, consumers of services.

3. TERMS AND DEFINITIONS

12. For the purposes of the Code, the following terms and definitions apply:

- 1) **shareholder** - a person who owns the Company's shares;
- 2) **partners** - individuals and legal entities (their associations) who are participants in mutually beneficial cooperation, including strategic partners;

3) **business ethics** - a set of ethical principles and norms of business conduct that guide the Company, its officials and employees in their activities;

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

5) **concerned parties** - individuals or legal entities whose interests are affected by the activities of the Company and/or its subsidiaries and/or jointly controlled entities, who have or believe that they have legitimate claims with respect to certain aspects of the Company and/or its subsidiaries and/or jointly controlled organizations;

6) **personnel service** - division of the Human Resource Management Department, departments (services) of personnel of separate business units/employee responsible for conducting personnel records management in a separate business unit;

7) **compliance risks** - the probability of losses and legal sanctions due to non-compliance by the Company, its officials and employees with the requirements of legislation, internal documents of the Company;

8) **conflict of interests** - any situations or circumstances whereby the personal interest/private interest/personal benefit/activity of an official or employee of the Company contradict the interests of the Company or may potentially conflict with them and thereby may lead to improper performance of their official/work duties and affect the objectivity of decisions on issues related to their competence;

9) **corporate culture** is Company-specific values, principles, norms of behavior and attitudes;

10) **ombudsman** - a person appointed by the Company's Board of Directors, whose role is to advise employees who have applied to him and assist in resolving labor disputes, conflicts, problematic issues of a social and labor nature, as well as in compliance with the principles of business (corporate) ethics by employees;

11) **employee** - an individual who is in an employment relationship with the Company and directly performs work under an employment contract;

12) **social network** - any Internet platform, online service or Internet resource designed to build, reflect and organize social relationships;

13) **mass media** - periodical printed publication, television, radio channel, documentary films, audiovisual recording and other form of periodic or continuous public dissemination of mass media, including Internet resources;

14) **ethical standards** - the values that the Company's employees should adhere to when carrying out their work.

4. CORPORATE VALUES AND PRINCIPLES OF BUSINESS ETHICS

Chapter 1. Corporate values

13. The fundamental corporate values on the basis of which the Company's activities are formed are:

1) **safety** - the Company strives to ensure trouble-free operation of production facilities, creates and maintains safe working conditions and takes care of the health of employees. In its work, the Company strives to prevent environmental pollution, economically and rationally use the energy consumed and natural resources.

Officials and employees are responsible for their own safety and for the safety of the people around them and must demonstrate by personal example an exceptional commitment to safety, occupational safety and health, compliance with industrial and fire safety;

2) **professionalism** - employees are the main value and the main resource of the Company. The level of professionalism of employees directly affects the results of activities and the value

created for shareholders and other interested parties. The Company values in its employees knowledge of the specifics of the Company's activities, timely and high-quality performance of tasks and ensures continuous improvement of professional knowledge and skills. The company strives to improve the level of qualification of employees, providing an opportunity for professional development.

Officials and employees should try to increase their level of competence, have the ability to make informed and responsible decisions, and also be focused on the growth and development of their professional, personal qualities and the level of ethical culture;

3) **efficiency** - the Company is aware of its responsibility to the state and stakeholders. In this regard, profitability and efficiency of activities, achievement of high results are an indisputable value for the Company. Improving business processes, optimizing costs, focusing on equipment modernization and investing in the development of production ensure the stable and stable operation of the Company;

4) **quality** - the Company strives to achieve high results, simplification, standardization of work, high-quality and timely fulfillment of promises, finding opportunities for improvement.

Chapter 2. Principles of business ethics

14. The Company, officials and employees are guided by the following principles of business ethics:

1) **openness** - the Company strives for maximum openness and reliability of information about the Company, its achievements and results of activities, taking into account the protection of information constituting commercial, official and other secrets protected by law.

Officials and employees strive to be open to meetings, discussions and dialogue, to build long-term cooperation with colleagues and stakeholders based on consideration of mutual interests, respect for the rights and balance between the interests of the Company and stakeholders;

2) **responsibility** - the Company is aware of its responsibility for the impact on the economy, the environment and society to the public, and to shareholders - for the growth of long-term value and sustainable development in the long term.

Officials and employees should thoughtfully and intelligently make decisions and perform actions at each level with a high degree of responsibility. Responsibility for the assumed obligations equally lies with all officials and employees of the Company, regardless of their status and position;

3) **transparency** - the Company's decisions and actions should be clear and transparent to stakeholders. The Company, in accordance with the established procedure, honestly and timely informs shareholders and other interested parties about the state of affairs.

The Company strives to increase transparency and accessibility of information by improving the quality of reporting and accounting in accordance with the law. Disclosure of information provided by the legislation and internal documents of the Company by officials and employees should be carried out taking into account the requirements for the protection of information constituting commercial, official and other legally protected secrets;

4) **ethical behavior** - the Company strives to be worthy of the trust of shareholders, other stakeholders and the general public in general. Trust arises as a result of consistent adherence to high ethical standards.

The decisions and actions of the Company's officials and employees should be based on high moral values, such as respect, honesty, openness, team spirit and trust, integrity and fairness. Officials and employees carry out their activities on the basis of respect, tolerance, goodwill and decency.

Officials and employees set an exceptional example of showing respect for the state and other languages, traditions and customs of the regions of the Company's presence, adhere to high moral and ethical standards of the culture of behavior, do not allow antisocial and unethical behavior that can harm the reputation of the Company in the present and in the future;

5) **respect** - the Company ensures that the rights and interests of all concerned parties are respected which follow from legislation, concluded contracts or indirectly within the framework of business relationships.

The Company respects human rights, recognizes their importance and universality, fully supports the fundamental principles established in the Universal Declaration of Human Rights, the Convention for the Protection of Human Rights and Fundamental Freedoms, in other recognized international human rights instruments, as well as those arising from the Constitution and legislation.

Employees have the right to fair and fair treatment regardless of gender, race, nationality, language, origin, property and official status, place of residence, attitude to religion and political beliefs;

6) **legality** - decisions and actions of the Company, officials and employees must comply with the legislation, internal documents of the Company, including the Charter [\[1\]](#), the Corporate Governance Code [\[2\]](#), the Development Strategy of KazTransOil JSC, decisions of the General Meeting of Shareholders of the Company;

7) **fairness and meritocracy** - The Company strives for a fair and objective assessment of the individual efforts, abilities and achievements of each employee, promotes the formation of a culture of understanding, interest and support by employees at all levels.

The Company does not allow the granting of any privileges and benefits to individual employees except on the basis of legislation and/or internal documents, with the mandatory provision of equal opportunities for all;

8) **intolerance to corruption** - the Company does not accept corruption in any of its manifestations. In cooperation with all interested parties, the Company strives to develop a constructive dialogue in order to increase their awareness of the Company's actions taken in the framework of combating corruption.

In order to maintain the high reputation of the Company, officials and employees in their daily work should make reasonable efforts to reduce the risk of business relations with counterparties who have been or may be involved in corrupt activities;

9) **inadmissibility of a conflict of interests** - the Company and interested parties must act towards each other as honestly, conscientiously, fairly and loyally as possible, take measures to prevent, identify and exclude a conflict of interests.

The Company strives to eliminate any possibility of a conflict of interest between the Company, officials and employees. The personal interests of officials and employees should not influence the impartial performance of their duties.

Officials and employees in relations with legal entities and individuals are obliged to refrain from actions that are risky from the point of view of a conflict of interests.

Officials and employees should avoid financial and other business relationships, as well as participation in joint work with organizations whose activities may cause a conflict of interest and interfere with the effective operation of the Company.

Officials and employees are obliged to immediately report any commercial or other interest (direct or indirect) in transactions, contracts, projects related to the Company, or in connection with other issues, a threat to the financial or other interests of the Company, the emergence of third-party personal business interests, as a result of which there is a threat of a conflict of interests.

Officials should inform in a timely manner and not participate in the discussion and voting on issues in which there is an interest.

In the event of a conflict of interest, its participants seek ways to resolve them through negotiations in order to ensure effective protection of the interests of the Company and interested parties.

Avoiding conflicts of interest is an important condition for ensuring the protection of the interests of shareholders and the Company, officials and employees of the Company;

10) ***environmental responsibility*** - in its activities, the Company strives to minimize the negative impact of its activities on the environment and society by taking care of resources, implementing modern environmental management systems and standards.

The Company is aware of its responsibility to society and future generations for the rational use of natural resources and the preservation of a favorable environment, ensuring energy conservation, reducing the negative impact on the natural environment, introducing innovative technologies aimed at careful and responsible use of resources and time, increasing labor productivity.

Each employee is responsible for the rational use of natural resources and environmental protection at their workplaces, in planning and decision-making processes.

15. The principles set out in [paragraph 14](#) of the Code should determine the behavior of Company officials and employees in their interaction with colleagues, as well as with all interested parties.

5. ETHICAL STANDARDS

16. The main areas of business relationships are regulated by the following ethical standards:

1) ***informed decision-making*** - the criteria of production and other decisions made in the Company are not exclusively economic in nature, they also take into account social, environmental indicators and the principles of sustainable development;

2) ***confidentiality of information*** - confidential information of the Company is information classified as such in accordance with the legislation and internal documents of the Company.

The Company respects and protects the confidentiality of employees' personal data and maintains an information security policy. The Company undertakes to protect the information constituting a state secret.

Officials and employees show a special degree of responsibility when working with data constituting confidential information, including personal data, in accordance with the legislation, internal documents of the Company and take all necessary measures to protect such information.

Officials and employees are prohibited from disclosing commercial, official and other secrets protected by law, as well as using such information for personal purposes. These requirements are regulated [by](#) the Information Disclosure Guidelines of KazTransOil JSC [3], as well as other Company documents;

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4) ***compliance with competition requirements*** - the Company does not enter into agreements or arrangements that hinder competition, and complies with the relevant legislation.

Officials and employees should refrain from proposals to enter into agreements that are explicit or implicit, formal or informal, written or oral, which are aimed at limiting competition.

Officials and employees must comply with the requirements of the competition law, as well as the relevant instructions of the antimonopoly authorities;

5) ***equal employment conditions and working conditions*** - the Company complies with labor legislation and creates comfortable working conditions for its employees. Employees are obliged to adhere to the norms of labor legislation and internal documents of the Company regulating labor relations and relations directly related to labor.

The Company ensures that there are uniform rules for hiring, evaluating achievements and promoting employees based on clear and transparent criteria. Officials and employees involved in making decisions on hiring, evaluating achievements and promoting employees are required to adhere to these rules.

The Company does not allow any discrimination based on gender, race, national or religious affiliation, granting any privileges and benefits to individual employees except on the basis of legislation and/or internal documents.

The Company recognizes the right of employees to unite and conclude a collective agreement in order to protect or preserve the rights of employees, as well as to provide them with additional social benefits;

6) **property protection** - officials and employees must ensure the safety of the property and other assets entrusted to them by the Company, ensure their effective targeted use. The Company's property and other assets should be used only for legitimate purposes related to the Company's activities.

The Company's property and other assets include: tangible assets, cash, intellectual property rights, know-how, business process data, network resources, as well as written correspondence, information transmitted and received by e-mail and other communication systems or stored in them.

Officials and employees are prohibited from using the Company's property, information or official position for the purpose of obtaining personal benefits. Intellectual property is one of the Company's most valuable assets. Officials and employees must protect patents, trademarks, copyrights, information constituting commercial, official and other legally protected secrets that are the property of the Company.

At the same time, it is necessary to respect the legitimate intellectual property rights of others;

7) **transparency of financial statements** - the Company provides accurate and complete financial and business information. All financial data, records and reports must comply with International Financial Reporting Standards, legislation and internal documents of the Company;

8) **exchange of gifts and representation expenses** - it is not allowed to accept any gifts by employees of the Company, who, according to the [Law](#) of the Republic of Kazakhstan "On Anti-Corruption" [4] belong to persons performing managerial functions in the Company.

Other employees of the Company are not entitled to accept gifts in connection with the performance of their functions, with the exception of symbolic tokens of attention and symbolic souvenirs in accordance with generally accepted norms of courtesy and hospitality or during protocol and other official events.

Employees should be aware that the exchange of business gifts and invitations to representative events is a socially recognized component of business relations, however, it must be remembered that such cases under no circumstances should damage the business reputation of the Company and should not be a "payment" for actions or omissions for certain direct or indirect economic purposes. Gifts should have a direct connection with the legitimate purpose of giving and not create the impression of illegal actions.

Any unauthorized gifts must be rejected/returned to the giver at the time of their delivery.

A gift is any value in tangible or intangible form, for which there is no obligation to pay the usual price, including money, securities and other property, benefits and services of a property nature (work, services, payment for entertainment, recreation, transportation costs, discounts, provision of property, including housing, charitable deposits, etc.) received in connection with work in the Company.

Under no circumstances should the provision/receipt of gifts be a hidden reward that can have a negative impact on the reputation of the employee and/or the Company as a whole.

Gifts to family members, relatives or other close persons of an employee of the Company, transferred in connection with the commission by such an employee of any actions (inaction) related to his/her work duties in the Company, promotion, or appointment to a position, are not allowed.

Representation expenses, including business hospitality, which employees on behalf of the Company can provide to other persons and organizations, or which employees in connection with their work in the Company can receive from other persons of organizations, must meet the totality of all the criteria listed below:

be directly related to the Company's business objectives;

be reasonably justified;

do not represent a hidden reward for a service, action, inaction, connivance, patronage, granting of rights, making a certain decision on a transaction, agreement, license, permit, etc. or an attempt to influence the recipient for another illegal or unethical purpose;

not to create reputational risk for the Company, its officials, employees and stakeholders in the event of disclosure of information about representation expenses;

do not contradict the principles and requirements of the Code, other internal documents of the Company and legal norms.

6. SUSTAINABLE DEVELOPMENT

17. The Company is aware of the importance of its influence on the economy, the environment and society and, striving for long-term value growth, ensures its sustainable development in the long term, observing the balance of interests of stakeholders.

18. The Company supports the principles of the United Nations Global Compact in the field of human rights, labor relations, environmental protection and anti-corruption, specified in [Annex 2](#) to the Code.

19. Officials and every employee should be aware of their influence and proportionate responsibility for the sustainable development of the Company in the long term, and make efforts to continuously improve their knowledge in the field of sustainable development.

7. BUSINESS RELATIONSHIPS

20. Interaction with stakeholders is an integral part of the Company's activities. Building constructive relationships with stakeholders has a significant impact on the business reputation and efficiency of the Company, as well as contributes to the prevention of compliance risks.

21. A partnership that provides for long-term, fruitful, trusting and mutually beneficial relationships with stakeholders is one of the most important resources for further development, ensuring the achievement of the Company's strategic goals.

22. Effective organization of work is based on mutual obligations between the Company and all interested parties. Compliance with mutual obligations is a necessary condition for constructive work.

§1. Relationship with shareholders

23. The observance and protection of shareholders' rights is one of the main priorities. The system of relations with shareholders is based on the principles of transparency, accountability and

responsibility in accordance with the requirements of legislation, the Company's Charter [1], as well as the provisions of the Corporate Governance Code [2].

24. The Company equally respects the rights of its shareholders regardless of the number of shares they own, maintains an effective dialogue with them, strives to justify their trust by fulfilling their stated development obligations and paying dividends.

25. By timely publishing reliable information about its activities in a form accessible to shareholders, the Company guarantees compliance with the rights of shareholders.

26. The procedure for the exchange of information between the Company and shareholders is regulated by the legislation, the Company's Charter [1] and internal documents of the Company.

§2. Relations with government agencies

27. The Company's interaction with state bodies is carried out in accordance with the requirements of legislation, the provisions of the Charter [1], the Corporate Governance Code [2] and other internal documents of the Company on the basis of the independence of the parties, in compliance with the principle of preventing corruption and other illegal actions, conflicts of interest, both on the part of state bodies and officials persons and employees of the Company.

§3. Relationships with service consumers, partners and suppliers

28. The Company is interested in building stable, long-term, transparent and mutually beneficial relationships with service consumers, partners and suppliers.

29. The selection of partners and suppliers is carried out by the Company on a transparent basis in accordance with the requirements of legislation, documents of Samruk-Kazyna JSC and NC KazMunayGas JSC and is based on the preference for the best price, quality and conditions, as well as the business reputation of the counterparty.

30. The Company complies with the terms of contracts with consumers of services, partners and suppliers and fulfills its obligations towards them.

31. The Company's relations with suppliers, including potential and existing ones, are based on the principles of legality, honesty, impartiality, integrity and intolerance to any manifestations of corruption in the evaluation and selection of potential suppliers, efficiency, fair competition, mutual benefit, information transparency, responsibility for the obligations assumed, strict compliance with the terms of contracts. Officials and employees should refrain from any actions that may lead to any suppliers receiving undue advantages.

32. The Company ensures the independent work of the relevant tender commissions and non-interference in their activities. Employees who are members of the tender commission must, without fail, immediately inform the tender commission in case of a conflict of interest situation during the supplier selection procedures.

33. The Company expects suppliers and their affiliated entities to comply with legal requirements, fair treatment of employees, non-use of child labor, ensuring safe working conditions, environmental protection and compliance with the provisions of the Code.

34. The Company does not allow the provision of unreasonable benefits and privileges to partners in its activities.

35. The Company may provide advantages to Kazakhstani suppliers in accordance with the documents adopted by Samruk-Kazyna JSC, and if the quality of services and goods of domestic suppliers meets its needs.

§4. Relationships with subsidiaries and jointly controlled entities

36. The main objectives of the Company's interaction with subsidiaries and jointly controlled entities are:

- effective use of their potential and assets in the general corporate interests;
- ensuring stable development, financial stability, effective management of subsidiaries and jointly controlled entities;
- ensuring the protection of the rights and legally protected interests of the Company and the fulfillment of its tasks.

37. The Company carries out relations with subsidiaries and jointly controlled entities in accordance with the requirements of the legislation, the Company's [Charter \[1\]](#) and other internal documents of the Company, the charters of subsidiaries and jointly controlled entities.

38. The Company's relations with subsidiaries and jointly controlled entities are based on the principles of the effectiveness of the management structure and ensuring the effective use and disposal of assets.

§5. Public relations

39. The Company is aware of its social responsibility to the public and adheres to the principles of implementing sustainable development and corporate social responsibility. Participation in sponsorship and charitable activities is determined in accordance with the decisions of Samruk-Kazyna JSC and authorized bodies of the Company.

40. The Company promotes the growth of the standard of living of the population directly or indirectly by promoting the growth of business and investment activity, also introduces the principles of social responsibility of business.

41. The Company strives to support programs aimed at developing socially significant areas of the economy, if this does not contradict the Company's [Charter \[1\]](#), the expectations and requirements of stakeholders and internal documents of the Company.

42. The Company strives to provide assistance in solving socially significant issues.

43. The Company strives to create new jobs and improve the professional qualifications of employees when it is economically profitable and expedient.

44. The Company strives to establish constructive relations with entities (public, non-governmental, non-profit and others) in order to improve public relations, improve the environment and ensure the safety of life, public health and the integrity of the assets of the Company and its stakeholders.

§6. Relations with the media

45. The Company provides an opportunity to obtain free access to public information about the Company. On the Company's Internet resource (<http://www.kaztransoil.kz>) information about the Company, the activities and major significant events of the Company, corporate governance, the activities of subsidiaries and jointly controlled organizations, as well as personnel policy, contact details, and so on is publicly available.

46. The Company strives to build constructive and effective communications with the mass media (hereinafter referred to as media relations) by providing the media with relevant and substantial information that contributes to the formation of a correct understanding of the Company's activities and prevents the dissemination of negative information for its reputation. Among the key directions of the Company's media relations is also the formation of a loyal attitude of the media by providing the media with the requested information within the time limits established by the Law of the Republic of Kazakhstan "On Mass Media" [\[5\]](#), the organization of public events.

47. The Company does not allow the dissemination of false information, concealment and/or distortion of facts in public speeches of officials and employees or other public relations events. Any information disclosed on behalf of the Company must be accurate in all material aspects, complete, correct and comply with the legislation and internal documents of the Company.

48. Officials and employees should understand and always remember that any point of view or information expressed by them as officials/employees of the Company is directly related to the Company itself, its image and affects its reputation in the business community.

Only authorized officials and employees have the right to speak publicly, comment on the Company's events or make any statements on behalf of the Company in the media, including the Internet.

49. When speaking on behalf of the Company, officials and employees are obliged to comply with generally accepted standards of business ethics, disseminate only reliable information, and also prevent the disclosure of confidential information.

50. Officials and employees should not publicly express their opinion on issues of employment and the Company's activities in general, if it:

does not correspond to the main activities of the Company;

discloses confidential information;

contains unethical statements addressed to officials or employees of the Company.

51. Restrictions on the placement of information in social networks, messengers, corporate and personal blogs, comments on publications in the media are given in [Annex 3](#) to the Code.

8. COMPANY, OFFICIALS AND EMPLOYEES

52. When carrying out its activities, the Company:

ensures transparency and openness in personnel management, constantly improves management methods, providing employees with favorable working conditions, opportunities for professional development and the realization of their potential;

when applying for a job, it does not allow any discrimination on any grounds. Recruitment and promotion of personnel is carried out solely on the basis of professional abilities, knowledge and skills;

excludes any possibility of nepotism, subjectivity or prejudice;

creates equal conditions for professional development of employees at all levels, appreciating employees striving for self-education and professional development in accordance with employee training and professional development programs;

considers human life as the highest value, pays special attention to the support of a healthy lifestyle and health protection;

implements social policy in relation to employees in accordance with the collective agreement between the Company and the Company's employees, internal documents of the Company, which is aimed at increasing the prestige of work in the Company;

creates a personnel reserve consisting of employees motivated for career growth with a high level of development of professional skills and managerial (business) competencies;

ensures confidentiality and protection of personal data of employees;

is responsible for making decisions that are free from conflicts of interest at any stage of the process, from an official to any decision-making employee.;

monitors, conducts research/surveys on the state of corporate culture and the level of business ethics of the Company's employees.

53. The Company's remuneration policy is based on the recognition of the professional qualities and abilities of employees, the results of their work and the achievement of key performance indicators.

54. The Company's occupational safety and health policy provides for ensuring safe working conditions for employees, reducing and preventing negative impacts on employees and the environment.

55. Officials and employees, assuming responsibilities to perform functions in good faith and reasonably with due care and prudence in the interests of the Company and shareholders, avoiding conflicts, must:

- be guided by the interests of the Company, and not by personal interests or personal benefit in the performance of official (labor) duties;

- be guided by corporate values, principles and norms stipulated by the Code;

- report violations of the provisions of the Code;

- by their attitude to work and behavior, contribute to the creation of a friendly and respectful environment in the team. Each employee contributes to the formation of a culture of behavior in the team and in interactions with stakeholders, maintaining adherence to the principles of business ethics;

- make every effort for highly professional work, take care of the Company's property, use it rationally and effectively;

- behave in such a way as not to allow a situation in which a conflict of interests may arise, either in relation to yourself (or related persons), or in relation to others;

- by their actions, strengthen the authority of the Company, prevent actions that can discredit the Company from working;

- be guided by the principles of legality, strictly observe the norms of legislation;

- respect the honor and dignity of a person and citizen regardless of origin, social, official and property status, gender, race, nationality, language, attitude to religion, beliefs, place of residence, place of work, availability of employment or any other circumstances;

- respect the state symbols - the Flag, the Coat of Arms and the Anthem;

- respect the corporate symbols, as well as the symbols of interested parties;

- during the performance of their work duties, adhere to a neat, business and corporate style in clothing and appearance (avoiding immodesty and excessive flashiness);

- conduct business negotiations in a respectful and calm tone, without allowing negative emotions and raising your voice;

- observe generally accepted moral and ethical norms, respect the state and other languages, traditions and customs of all peoples and representatives of religious denominations;

- observe the generally accepted rules of etiquette during corporate events;

- adhere to the general moral and ethical standards of behavior during non-working hours, avoid antisocial behavior that can harm the reputation of the Company;

- be polite and correct;

- show modesty, kindness, clarity in statements, be able to behave with dignity and calmness in conflict situations;

- be intolerant of indifference and rudeness;

- assist in conducting investigations on violations of the principles of business ethics and ethical standards;

- always be grateful for assistance, even if it is not fully provided;

- be attentive to other people's opinions;

- to try to ensure the unity of word and deed, to fulfill promises;

- be able to admit your wrongness and/or mistakes;

- do not emphasize or use your official position;

by their actions and decisions, do not give rise to reasonable criticism from interested parties, do not allow prosecution for criticism, tolerate it, use constructive criticism to eliminate shortcomings and improve their professional activities;

don't hide/admit your mistakes.

56. Officials and employees are prohibited from:

public statements that present the work of the Company, its employees, stakeholders in an incorrect, negative or distorted light;

use of narcotic drugs, psychotropic substances and their analogues;

being intoxicated at the workplace, drinking alcoholic beverages at the workplace, on the territory of the Company or at the place of work on behalf of the Company, with the exception of special events, subject to compliance with the norms of business etiquette;

smoking outside designated areas;

aggressive, humiliating or humiliating, hostile, intimidating actions, actions and behavior, complicity in such behavior of others or connivance with such behavior of others;

distribution of offensive materials, including visual images;

speaking on behalf of the Company, if it is not within their competence, and they do not have the appropriate authority to do so;

actions that directly or indirectly may negatively affect the image and reputation of the Company;

represent the Company in business relations with organizations in which the official / employee has a significant personal interest other than the interests of the Company, including (but not limited to) cases of predominant participation in the authorized capital or management bodies of such organizations of the employee himself, his close relatives or family members.

57. Decision-making by Company officials should be based on the principles of transparency. Officials provide each other with reliable information in a timely manner, without violating confidentiality standards and taking into account the decisions of the Company's bodies, internal documents of the Company.

58. Managers who have employees under their command must:

to accurately determine the tasks and scope of work responsibilities of subordinates in accordance with their positions/working professions and objective considerations of labor rationing;

not to contribute to the manifestations of bureaucracy in the performance of their work duties, as well as in every possible way to improve the efficiency of work, personally taking feasible measures to facilitate the work process;

to prevent unfounded accusations, facts of rudeness, humiliation of human dignity, tactlessness and indifference towards subordinates;

show modesty, kindness, clarity in statements, be able to behave with dignity and calmness in stressful and conflict situations;

do not emphasize or use your official position to the detriment of the interests of subordinates;

serve as an example of justice, responsibility, professionalism and honesty by your behavior;

to prevent harassment for criticism, as well as to be attentive, polite and tolerant of the appeals of subordinates;

use constructive criticism to eliminate shortcomings and improve the professional activities of subordinates;

not to compel subordinate employees to commit violations of the law and requirements, illegal offenses or acts incompatible with generally accepted moral and ethical norms of behavior;

to ensure an impartial and fair treatment of all employees of the Company without exception, to prevent any form of discrimination of employees, as well as the provision of illegal benefits and privileges to certain categories of people;

to create an open communication environment in the team, in which each employee feels comfortable, bringing up a particular issue for discussion;

ensure active interaction of subordinate employees with the Company's structural divisions on ethics issues, provide support to employees who conscientiously initiate discussion of ethical issues;

take immediate measures to eliminate violations of the requirements of the Code, as well as take the necessary measures of influence;

take into account employees' compliance with the requirements of the Code and employees' contribution to the formation of a culture of behavior in the Company when conducting their assessment;

do everything possible so that employees understand that ethical behavior is no less important than the results of the Company's activities;

be demanding, objective when organizing work and resolving disputes and conflict situations when they arise.

9. CONSIDERATION OF APPEALS ON ISSUES OF COMPLIANCE WITH BUSINESS ETHICS

59. Any situation leading to violation of the rights of officials and employees should be considered in accordance with the norms of legislation and internal documents of the Company.

60. On the application of the provisions of the Code and /or ethical issues that have arisen in the course of work, officials and employees of the Company have the right to contact the Ombudsman.

61. Concerned parties have the right to inform the Board of Directors through the Ombudsman about illegal and unethical actions of members of the Management Board, and their rights should not be infringed in the event of such a report.

62. The Ombudsman Institution was established within the framework of initiatives, measures and actions taken by shareholders, the Board of Directors and the Management Board of the Company in order to:

ensuring compliance by structural divisions and all employees of the Company with the provisions of the Code;

strengthening measures to prevent and resolve corporate conflicts and conflicts of interest.

63. The procedure for appointment and termination of powers, functions, rights and duties of the Ombudsman are defined by the [Statute](#) on the Ombudsman of KazTransOil JSC [6].

64. Issues of business ethics and/or cases of violation of the principles of business ethics, legal requirements and internal documents of the Company may also be discussed by employees with the immediate supervisor, or with the next-level supervisor, if the norms of the Code are violated by the immediate supervisor himself. If an acceptable solution is not found based on the results of the discussion, the Ombudsman should be notified of the relevant problem in order to receive recommendations and/or take appropriate measures.

65. In case of detection of violations by officials and employees of the Company of the norms of business ethics, legislation and internal documents of the Company, the Ombudsman forms materials for further referral for consideration and decision-making to the relevant officials / to the relevant structural divisions of the Company, whose competence includes the resolution of the issues indicated in the appeals.

At the same time, the applicant is guaranteed confidentiality, impartiality and impartiality when considering information about violations of the provisions of the Code, legislation and internal documents of the Company.

66. When considering an appeal, the Company is guided by verified facts and reliable information. If an official or an employee transmits deliberately false information discrediting the honor and dignity of another person, then he may be held liable in accordance with the procedure established by law.

67. On the facts of corruption and other illegal actions, officials and employees of the Company can contact by phone +7(7172)555-210, by the electronic information system of the Company's trust - doverie@kaztransoil.kz, to a special dedicated line "No corruption!" 5213@kaztransoil.kz to take appropriate measures. At the same time, their rights should not be infringed in the case of such treatment.

68. The Company processes and records appeals from officials and employees (internal appeals), requests and appeals from interested parties regarding violations of business ethics, legislation and internal documents of the Company.

10. RESPONSIBILITY

69. Officials and employees are responsible for compliance with ethical standards within the framework of their behavior. Compliance with the Code is mandatory for all officials and employees of the Company. Violation of the norms of the Code entails disciplinary liability in accordance with the procedure established by law.

70. Managers who have employees under their command are responsible for the moral and psychological climate in the team, the formation of a culture of behavior in which employees understand their rights and obligations and freely express concern about possible non-compliance with the rules without fear of persecution.

11. FINAL PROVISIONS

71. The Board of Directors periodically reviews and improves the provisions of the Code, analyzes to what extent they are implemented in practice, and, if necessary, makes changes and/or additions to it.

72. The Code is not an exhaustive set of rules and cannot provide recommendations for all possible situations that officials, employees and interested parties may encounter during the performance of their official (labor) duties and in relations with the Company.

73. If it is necessary to make decisions in a situation not directly provided for by the Code, each official, employee and/or interested party should ask themselves the following questions:

✓ *Is the action that causes my concern legal?*

✓ *Does it correspond to the corporate values and interests of the Company?*

Does it expose the Company to any unacceptable risks?

✓ *Will this negatively affect the reputation of the Company?*

✓ *Is it fair?*

✓ *Do I have such authority?*

✓ *Will my actions be a good example for other employees of the Company?*

74. If the answer to any of these questions is negative, or questions arise in connection with the application of the Code, then the situation should be discussed with the immediate supervisor, the Ombudsman, or representatives of the responsible structural unit for anti-corruption and/or compliance control. The Company guarantees that no employee will be prosecuted if he reported facts of non-compliance with the Code and/or other violations.

12. ANNEXES

Annex 1 (required)	Form of obligation to comply with the Code of Business Ethics of KazTransOil JSC
Annex 2 (informational)	Principles of the United Nations Global Compact on Human Rights, Labor Relations, Environmental Protection and Anti-Corruption
Annex 3 (informational)	Restrictions on the placement of information in social networks, messengers, corporate and personal blogs, comments on publications in the media

13. REFERENCES*

[1]	The Charter of KazTransOil Joint-Stock Company approved by the decision of the Sole Shareholder of the Company (Minutes of the meeting of the Board of Directors of NC KazMunayGas JSC dated October 19, 2012 No.8/2012)
[2]	The Corporate Governance Code approved by the decision of the General Meeting of Shareholders of the Company (Minutes No. 3/2016 dated May 27, 2016)
[3]	Information Disclosure Guidelines of KazTransOil JSC, approved by the decision of the Company's Management Board (Minutes of the meeting dated September 24, 2018 No. 24)
[4]	The Law of the Republic of Kazakhstan dated November 18, 2015 "On Anti-Corruption"
[5]	The Law of the Republic of Kazakhstan dated July 23, 1999 "On Mass media"
[6]	Statute on the Ombudsman of KazTransOil JSC, approved by the decision of the Company's Board of Directors (Minutes of the meeting dated April 24, 2020 No. 4/2020)

*When using the Code, it is advisable to check the validity of the reference documents as of the current date. If the reference document is replaced (changed), then when using the Code, the replaced (changed) document should be guided. If the reference document is canceled without replacement, the provision in which the reference to it is given applies in the part that does not affect this reference

Annex 1
(required)

**Obligation to comply with the
Code of Business Ethics of KazTransOil JSC**

I, _____,
(full name, position/profession)

confirm that I have fully read the Code of Business Ethics of KazTransOil JSC, understand its contents and undertake to faithfully follow the principles of business ethics and rules of conduct established by this Code.

Employee's signature _____

Date _____, 2023

Annex 2
(informational)

**Principles of the United Nations Global Compact on
Human Rights, Labor Relations, Environmental
Protection and Anti-Corruption**

Human rights:

1. The business community should support and respect the protection of internationally proclaimed human rights.
2. The business community should not be involved in human rights violations.

Labor relations:

3. The business community should support freedom of association and the real recognition of the right to conclude collective agreements.
4. The business community should advocate for the elimination of all forms of forced and compulsory labor.
5. The business community should advocate for the complete eradication of child labor.
6. The business community should advocate for the elimination of discrimination in labor and employment.

Environment:

7. The business community should support a precautionary approach to environmental issues.
8. The business community should take initiatives aimed at increasing responsibility for the state of the environment.
9. The business community should promote the development and dissemination of environmentally sound technologies.

Anti-corruption:

10. The business community must resist all forms of corruption, including extortion and bribery.

Annex 3
(informational)

**Restrictions on the placement of information in social networks,
messaging, corporate and personal blogs, comments on
publications in the media**

When posting information on social networks, messaging, corporate and personal blogs, comments on publications in the media, employees must:

- 1) comply with generally accepted ethical standards;
- 2) not to disclose confidential information of the Company, information from internal correspondence, audio and video recordings of conversations in the Company;

3) when mentioning the Company, always speak only on their own behalf and use the pronoun "I", not "We", and also explain that all published information is the personal opinion of the employee, and not the official position of the Company;

4) not to engage in polemics on behalf of the Company and not to comment on behalf of the Company on the events of the Company and the oil and gas industry, international events and topics actively discussed in the Internet space;

5) avoid topics involving racial, national, religious and gender issues;

6) not to answer users' questions about the Company's activities and send them to the business units of the Company responsible for maintaining the Company's official pages on social networks;

7) do not use Company logos or trademarks (unless authorized to do so);

8) not to send information with content that is illegal and/or contains knowingly false information that defames the honor and dignity of another person or undermines his/her reputation;

9) do not publish the address of the corporate mailbox for personal purposes when registering on various Internet resources;

10) do not publish personal photos from corporate events on the Internet with an indication of the Company;

11) do not leave feedback and negative comments about the Company as a whole, the Company's management /direct manager, colleagues, stakeholders of the Company and other persons;

12) remember and be aware of responsibility due to the fact that it is not always possible to delete information published on the Internet.

If any statements of the Company's employee are regarded as causing reputational damage to the Company, the Company reserves the right to contact the employee with a recommendation to make corrections, delete relevant posts and comments on personal pages.