



Approved
by resolution of the Board of Directors
of Intergas Central Asia JSC
Minutes No. 6 dated "17" july 2024

**ANTI-CORRUPTION POLICY
OF INTERGAS CENTRAL ASIA JSC**

ОРИГИНАЛ

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Astana, 2024

Foreword

Introduced: to replace the "Anti-Corruption Policy of Intergas Central Asia JSC" (P-10-23), approved by resolution of the Board of Directors of Intergas Central Asia JSC, Minutes No. 5 dated 12.06.2023, Revision No. 1.

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АО «Интергаз Центральная Азия»

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1 Purpose and scope

1.1. This Anti-Corruption Policy of Intergas Central Asia JSC (hereinafter referred to as the Policy) has been developed in accordance with the requirements of the Law of the Republic of Kazakhstan "On Combating Corruption" and other legislative acts of the Republic of Kazakhstan in the field of anti-corruption, the Corporate Standard on the compliance function of the Samruk-Kazyna JSC group, the Corporate Standard on the compliance function of the QazaqGaz NC JSC group of companies, the Code of Business Ethics of Intergas Central Asia JSC, as well as other internal regulatory documents governing the activities of Intergas Central Asia JSC (hereinafter referred to as the Company).

1.2. The Company believes that strict compliance with the anti-corruption legislation of the Republic of Kazakhstan is one of the most important conditions for sustainable business development.

1.3. The Company declares its categorical rejection of dishonest and unlawful business practices and makes its best efforts to comply with the requirements of the international standard ISO 37001:2016 "Anti-bribery management systems — Requirements with guidance for use" (hereinafter referred to as international standard ISO 37001) and ISO 37301:2021 "Compliance management systems" when establishing its anti-corruption management system.¹

1.4. The Policy establishes:

- 1) the basic anti-corruption principles of the Company;
- 2) the managerial and organizational framework for preventing corruption offences;
- 3) measures to minimize and prevent corrupt practices;
- 4) compliance reviews of reported violations;
- 5) development among employees of a commitment to strict compliance with the legislative acts of the Republic of Kazakhstan, as well as the internal regulatory documents governing the Company's activities;
- 6) general principles for accepting and giving gifts and providing and accepting hospitality within the Company, as well as the activities of the Company's structural units in registering gifts and hospitality.

1.5. The principal objective of the Policy is to ensure the commitment of the Company's officers and employees to high standards of conduct, open and honest business practices, strengthening the Company's business reputation and increasing trust in the Company. The provisions of the Policy and the Code of Business Ethics complement each other.

1.6. The Policy is mandatory for familiarization and strict compliance by all associated persons, officers and employees of the Company (including outstaffed personnel).

1.7. The Company recommends that its counterparties comply with the requirements of the Policy and ensure compliance with the Policy by their employees.

2. Regulatory references

2.1. The Policy contains references to the following regulatory legal acts and internal regulatory documents:

- Criminal Code of the Republic of Kazakhstan;
- Law of the Republic of Kazakhstan "On Combating Corruption";
- Law of the Republic of Kazakhstan "On Joint Stock Companies";

¹For reference: in international standard ISO 37001, "bribery" is defined as the offering, promising, giving, accepting or soliciting of an undue advantage of any value (which may be financial or non-financial), directly or indirectly, and irrespective of location, in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties. In addition, international standard ISO 37001 uses the concept of "bribery" in relation to the public, private and not-for-profit sectors. Under the legislation of the Republic of Kazakhstan, "bribery" refers to corruption crimes committed in the public and quasi-public sectors. The complete list of criminal offences classified as corruption-related is set out in subparagraph 29) of Article 3 of the Criminal Code of the Republic of Kazakhstan.

- Code of Business Ethics of the Company;
- DP-01 General requirements for the content, presentation and formatting of internal regulatory documents of Intergas Central Asia JSC;
- DP-02 Document management.

3. Terms and definitions

3.1. The terms and their corresponding definitions used in the Policy are set out in Table 1.

Table 1. Terms and definitions

Administrative and economic functions	the right, granted in accordance with the procedure established by the laws of the Republic of Kazakhstan and the Company's internal documents, to manage and dispose of property carried on the Company's balance sheet
anti-corruption legislation	the Law of the Republic of Kazakhstan "On Combating Corruption" and other regulatory legal acts concerning anti-corruption matters
anti-corruption monitoring	the Company's activities involving the collection, processing, consolidation, analysis and assessment of information concerning the effectiveness of anti-corruption policy, the state of law-enforcement practice in the field of anti-corruption, as well as public perception and assessment of the level of corruption
anti-corruption restrictions	restrictions established by the Law of the Republic of Kazakhstan "On Combating Corruption" and aimed at preventing corruption offences
associated persons	members of the Board of Directors and Management Board of the Company, agents, joint venture partners and other persons providing services to the Company or acting on its behalf
close relatives	parents, children, adoptive parents, adopted children, full and half siblings, grandparents and grandchildren
internal analysis of corruption risks	the Company's activities to identify and examine the causes and conditions conducive to the commission of corruption offences
"Hotline"	the unified Samruk-Kazyna JSC Hotline for receiving reports of any violations of the Code of Conduct, including corruption, discrimination, unethical conduct and other violations
officers	members of the Board of Directors and members of the Management Board of the Company
persons equated to persons authorized to perform state functions	a person performing managerial functions in the Company; a person authorized to make decisions on organizing and conducting procurement, including public procurement, or responsible for the selection and implementation of projects financed from the state budget and the National Fund of the Republic of Kazakhstan, holding a position not lower than the head of an independent structural unit
person performing managerial functions	a person who permanently, temporarily or under special authority performs organizational and administrative or administrative and economic functions in the Company
material remuneration	material assets, benefits or advantages transferred for the benefit of, or accepted from, third parties
conflict of interest	a conflict between an employee's personal interests and official powers, in which personal interests may result in non-performance and/or improper performance of official duties
corruption	the unlawful use by the Company's officers of their official powers and related opportunities for the purpose of obtaining or extracting, personally or through intermediaries, property or non-property benefits and advantages for themselves or third parties, as well as bribing such persons by providing benefits and advantages
corruption risk	the possibility of causes and conditions arising that are conducive to the commission of corruption offences and crimes
corrupt practices	intentional acts (actions or omissions) committed by an officer or employee of the Company using their official position for the purpose of obtaining benefits in the form of property or other advantages
corruption offence	an unlawful culpable act (action or omission) bearing signs of corruption for which administrative or criminal liability is established by law

counterparty	an individual or legal entity with which the Company has entered into or plans to enter into a contract/agreement
organizational and administrative functions	the right, granted in accordance with the procedure established by the laws of the Republic of Kazakhstan and the Company's internal documents, to issue orders and instructions binding on employees, as well as to apply incentives and disciplinary sanctions to employees
responsible structural unit	Compliance Service of the Company
combating corruption	the activities of the Company and its officers and employees, within their authority, aimed at preventing corruption, including developing an anti-corruption culture, identifying and eliminating the causes and conditions conducive to corruption offences, as well as detecting and suppressing corruption offences and eliminating their consequences
prevention of corruption	the Company's activities to study, identify and suppress corruption offences, establish and eliminate the causes and conditions conducive to corruption offences, as well as activities aimed at developing an anti-corruption culture, including intolerance of all manifestations of corruption
representation expenses	expenses for receptions, attendance at cultural and entertainment events, catering services, payment for interpreters' services, etc.
employee	an individual in an employment relationship with the Company who directly performs work under an employment contract, as well as persons actually performing employment functions or acting on behalf of or in the interests of the Company, including within the framework of outstaffing, paid service agreements concluded outside procurement procedures, secondment and other forms
relatives by marriage	siblings, parents and children of a spouse
development of an anti-corruption culture	activities carried out by the Company within its competence to preserve and strengthen in society a system of values reflecting intolerance of corruption

Definitions used but not disclosed in the Policy correspond to the definitions used in the legislation of the Republic of Kazakhstan, the Charter and other internal documents of the Company.

4. Abbreviations and designations

4.1. The abbreviations and designations used in the Policy are set out in Table 2:

Table 2. Abbreviations and designations

No. item	Designations and abbreviations	Full names of the designations and abbreviations
1	HR&PRD	Human Resources and Payroll Department
2	Company	Intergas Central Asia JSC
3	Branches	Branches of the Company (Main Gas Pipeline Directorates, Engineering and Technical Center)
4	BPMD	Business Process Management Department

5. Responsibilities and authority

5.1. The Company's Compliance Service is responsible for developing this Policy in accordance with the requirements of the documented procedure "General requirements for the content, presentation and formatting of internal regulatory documents of Intergas Central Asia JSC" (DP-01).

5.2. Responsibility for compliance with the requirements of the Policy rests with the Company's managers and employees.

5.3. Responsibility for managing this Policy in accordance with the requirements of documented procedure DP-02 "Document Management" rests with the BPMD and the Compliance Service.

6. Main provisions

6.1 Basic anti-corruption principles

6.1.1 The basic anti-corruption principles of the Company are:

1) zero tolerance for any manifestation of corruption – the Company adheres to the principle of complete rejection of corruption in any form or manifestation in the course of its activities.

The principle of zero tolerance for any manifestation of corruption means a strict prohibition on associated persons, officers and employees acting on behalf of or in the interests of the Company, directly or indirectly, personally or through any intermediary, participating in corrupt practices regardless of business practices in any particular country, as well as a prohibition on actions or omissions that create conditions conducive to corruption offences;

2) commitment of senior management and setting the “tone at the top” – the Board of Directors of the Company plays a key role in developing a culture of intolerance of corruption. Members of the Board of Directors and the Management Board of the Company openly and consistently declare their uncompromising attitude toward all forms of corruption and demonstrate, observe and implement this principle at all levels by personal example;

3) engagement of officers and employees – the Company informs its officers and employees of the provisions of anti-corruption legislation and welcomes their active participation in the development and implementation of anti-corruption standards and procedures, the development of an anti-corruption culture, and the acceptance by officers of anti-corruption restrictions provided for by the legislation of the Republic of Kazakhstan;

4) inevitability of punishment – the Company declares that punishment of the Company’s officers and employees is inevitable, regardless of position, length of service or other circumstances, if they commit corruption offences or corrupt practices in the performance of their official duties, or fail to comply with the Company’s internal anti-corruption documents, including records and guidance notes of the responsible structural unit;

5) legality and compliance with anti-corruption legislation – the Company strictly complies with the anti-corruption legislation of the Republic of Kazakhstan and other countries in which it conducts or plans to conduct activities, and none of its actions or omissions shall contravene applicable anti-corruption legislation;

6) proportionality of corruption prevention and anti-corruption procedures – the Company develops and implements control procedures designed to reduce the likelihood of the Company, its associated persons, officers and employees becoming involved in corrupt activities, proportionate to the corruption risks that may arise in the Company’s activities;

7) effectiveness of anti-corruption procedures – the Company seeks to make procedures as transparent, clear and practicable as possible, ensuring ease of implementation and meaningful results. The Company evaluates the effectiveness of existing control procedures and improves them where they are ineffective;

8) monitoring and control – the Company monitors the state of corruption risks and controls compliance with and the effectiveness of implemented procedures for preventing and combating corruption;

9) avoidance of conflicts of interest – the Company believes that its officers and employees must not directly or indirectly influence decision-making in the Company where there is a conflict between their interests and those of the Company;

10) due diligence – when establishing or continuing business relationships with counterparties, job candidates or other third parties, the Company exercises due diligence by conducting timely checks of their integrity and the absence of conflicts of interest;

11) leadership and coordination – the Company ensures interaction and cooperation in anti-corruption activities with government authorities and associated/third parties of the Company, as well as coordination of actions in the process of combating corruption.

6.2 Corruption risk assessment

6.2.1 In accordance with the legislation of the Republic of Kazakhstan, the Company conducts an internal assessment of corruption risks.

6.2.2 The purpose of identifying and assessing corruption risks is to identify those activities and business processes of the Company that are exposed to risks of non-compliance with anti-corruption legislation and where there is a high likelihood of corruption offences being committed by officers and employees, both for personal gain and for the benefit of the Company.

6.2.3. Identification and assessment of corruption risks are carried out on the basis of anti-corruption monitoring and internal analysis of corruption risks.

6.2.4 Anti-corruption monitoring includes, but is not limited to, the following measures:

1) conducting compliance reviews of the Company's key internal documents and drafts submitted for approval to identify provisions that may create causes and conditions for corruption (factors), and developing proposals to eliminate them;

2) conducting compliance reviews of materials submitted to the Management Board and the Board of Directors of the Company;

3) monitoring the anti-corruption legislation of the Republic of Kazakhstan, as well as the anti-corruption legislation of foreign states affecting the Company's activities, in order to promptly bring its internal documents into compliance with changing anti-corruption requirements;

4) reviewing statistics on reports from individuals and legal entities concerning manifestations of corruption by officers and employees;

5) monitoring publications in the mass media.

6.2.5 The object of the internal analysis of corruption risks is the Company's activities and includes:

1) identifying "critical points" in business processes where corruption offences are most likely to occur;

2) describing corruption schemes, including:

- the nature of the benefit or advantage that may be obtained by the Company or its individual officers and employees through the commission of a corruption offence;

- positions within the Company that are "key" to the commission of a corruption offence;

- likely forms of corrupt payments;

3) determining the existence or absence of internal control procedures and assessing the effectiveness of existing control procedures.

6.2.6 Based on the results of the corruption risk assessment, measures are developed to eliminate the causes and conditions conducive to corruption offences, with ongoing monitoring.

6.2.7 A zero tolerance level for corruption risk is adopted for any corruption scheme. In each case, the Company promptly develops measures to minimize corruption risks identified through the internal analysis.

6.2.8 The procedure for identifying and assessing corruption risks and developing measures to minimize them is governed by legislation and the Company's internal regulatory documents.

6.3 Counterparty due diligence

6.3.1. When interacting with counterparties and other stakeholders, before deciding to commence or continue business relationships, and when participating in legal entities, the Company:

1) complies with the procedures established by the Procurement Procedure of Samruk-Kazyna Sovereign Wealth Fund JSC and legal entities in which fifty percent or more of the voting shares (participatory interests) are directly or indirectly owned or held in trust by Samruk-Kazyna JSC;

2) monitors the actions of counterparties, partners, participants (shareholders) in joint ventures and other parties for any manifestations of corruption by carrying out the following procedures (including but not limited to):

- 2.1) integrity due diligence;
- 2.2) verification of business reputation and absence of conflicts of interest;
- 2.3) verification of links with public officials;
- 2.4) verification of the existence of their own anti-corruption policies and procedures, readiness to comply with the requirements of the Policy and engage in mutual cooperation in the field of anti-corruption;
- 3) includes an anti-corruption clause in transactions entered into;
- 4) includes the Supplier Code in transactions entered into, in the form set out in Appendix No. 5 to this Policy (applicable to contracts for the procurement of goods, works and services).
- 6.3.2. The Company informs counterparties and partners of the requirements of this Policy and welcomes their adoption of the established requirements.
- 6.3.3. The procedure and criteria for checking counterparties, partners and participants (shareholders) in joint ventures are governed by the Company's internal documents.

6.4. Participation in charitable, sponsorship and political activities

- 6.4.1 The Company does not finance charitable or sponsorship projects for the purpose of obtaining or retaining an advantage in its activities.
- 6.4.2 The Company, as well as its officers and employees, does not finance political parties or public associations for the purpose of obtaining or retaining an advantage in its activities.
- 6.4.3 When participating in public associations, officers and employees are prohibited from offering, giving, promising or making payments, contributing property or giving gifts on behalf of the Company for the purpose of obtaining or retaining an advantage for the Company in its activities.
- 6.4.4 Officers and employees bear personal responsibility, in accordance with the applicable legislation of the Republic of Kazakhstan, for participation in public organizations.

6.5. Facilitation payments

- 6.5.1. The Policy prohibits making or accepting payments as remuneration for facilitating formalities. Facilitation payments are payments made to officers and employees to perform or expedite routine procedures. Facilitation payments are distinct from official service fees, the amounts of which are publicly available.

6.6. Giving and accepting gifts and other services (tokens of attention)

- 6.6.1. In accordance with the legislation of the Republic of Kazakhstan and the Code of Business Ethics, the Company prohibits officers and employees, as well as members of their families, from receiving material remuneration, gifts or services provided in return for actions (omissions) by such persons in favor of the persons providing such material remuneration, gifts or services, where such actions (omissions) fall within the official powers of the officers or employees or where, by virtue of their official powers, they may facilitate such actions (omissions).
- 6.6.2. Gifts and money received without the knowledge of officers and/or members of their families are subject to gratuitous transfer/remittance to the State Property and Privatization Committee of the Ministry of Finance of the Republic of Kazakhstan in accordance with the requirements of anti-corruption legislation, with mandatory notification of the Company's Compliance Service.
- 6.6.3. The Company recognizes the exchange of business gifts (souvenirs) during official meetings and the incurrence of representation expenses, including business hospitality, as a necessary part of doing business and an accepted business practice. The Company strongly encourages an atmosphere of honesty and transparency regarding business gifts and business hospitality expenses.

6.7. Representation expenses, including business hospitality with third parties, shall meet the following criteria:

- 1) fully comply with the legislation of the Republic of Kazakhstan, the Code of Business Ethics and the Company's internal regulatory documents;
- 2) be reasonably justified, proportionate and not constitute luxury items;
- 3) not constitute concealed remuneration for a service, action, omission, acquiescence, patronage, grant of rights, adoption of a particular decision concerning a transaction, agreement, license, permit, etc., or an attempt to influence the recipient for any other unlawful or unethical purpose;
- 4) hospitality must not be intended, or be capable of being perceived as intended, to influence or induce a person to act in a particular manner, or to reward that person for performing their role or function;
- 5) not create a reputational risk for the Company, its officers and employees, or other persons if information about gifts or representation expenses is disclosed;
- 6) hospitality must be appropriate, remain within the limits established by the Policy and not violate the hospitality policy of the relevant third-party organization.

6.7.1 Any hospitality shall be provided in accordance with the legislation of the Republic of Kazakhstan and the Company's internal regulatory documents.

6.7.2 Offering hospitality or gifts to civil servants, officers of quasi-public sector entities and members of their families is not permitted. Gifts must also not be offered or given where it is known that acceptance of a gift is unacceptable to the recipient.

6.7.3 All expenses for business gifts and business hospitality, as well as advertising expenses, shall be incurred strictly in accordance with the Company's approved business plan. Budget applications of administrators of such budget programs shall be approved in advance by the responsible structural unit and the Company's management.

6.7.4 If there is any doubt as to whether a business gift or event complies with the requirements of the Policy, the employee should consult their immediate supervisor or the responsible structural unit.

6.7.5 In the performance of their official duties, employees and officers of the Company shall avoid giving and/or accepting gifts and hospitality where such actions would exert improper influence or create the appearance of such influence on employees, officers and business partners of the Company.

6.7.6 When entering into business relationships, employees are advised to familiarize business partners with the Policy and, where available, to familiarize themselves with a similar internal document adopted by business partners or third parties.

6.7.7 If a gift in the form of cash or cash equivalents is received inadvertently, the employee shall notify the head of their unit in writing or, if the employee is the head of a unit, the responsible structural unit, and arrange for its immediate return.

6.7.8 An employee shall notify the head of their unit or the manager supervising their unit in writing (if the employee is the head of a unit) where hospitality from a third party has been accepted inadvertently:

- 1) refreshments (meal expenses) in the ordinary course of business relations with third parties;
- 2) a ticket or invitation (in the company of the third party) to cultural events that are appropriate and do not exceed the bounds of ordinary business courtesy.

6.7.9 The Company's responsible structural unit may conduct a preliminary assessment of gifts, representation expenses, hospitality, etc. for compliance with the criteria specified in subparagraphs 1–6) of paragraph 6.7 of the Policy, which will, among other things, help prevent cases of inadvertent acceptance of hospitality from a third party.

6.7.10 The actions referred to in this section shall be registered in the Gifts and Hospitality Register maintained by the Company's responsible structural unit in accordance with Appendix No. 2 to the Policy.

6.7.11 The Register shall be maintained in hard copy, bound and page-numbered in order to prevent corrections, alterations and erasures.

6.8 "Hotline"

6.8.1 In order to maintain a high level of trust in the Company, comply with international standards of business ethics, and prevent and suppress fraud and corruption, a unified Hotline operates within the Samruk-Kazyna JSC group of companies. By contacting the Hotline, any person may, in a form convenient to them, including anonymously, report known facts of theft and misappropriation within the Company, fraud, bribery, commercial bribery, receipt of unlawful remuneration, conflicts of interest, other manifestations of corruption and violations of the Policy.

6.8.2 After registration on the Hotline, reports are forwarded to the Company's Compliance Service for confidential review. Each report is carefully reviewed, the results are communicated to the responsible persons of the Company, and where grounds exist, an appropriate review (investigation) is conducted in accordance with the Company's internal documents and procedures. Hotline contact details are posted on the Company's official website and internal portal, as well as on the official website of Samruk-Kazyna JSC.

6.8.3 The Samruk-Kazyna JSC group of companies also operates the unified E-Compliance information system, which consolidates information on reports received through the Hotline and governs the process for conducting reviews.

6.9 Review procedure

6.9.1 The procedure for conducting reviews is governed by the Corporate Standard on the compliance function of the Samruk-Kazyna JSC group, the Corporate Standard on the compliance function of the QazaqGaz NC JSC group of companies, and the Company's internal documents and procedures.

6.10 System of anti-corruption measures in the Company:

- 1) anti-corruption monitoring;
- 2) internal analysis of corruption risks;
- 3) development of an anti-corruption culture;
- 4) development of and compliance with anti-corruption standards;
- 5) financial control;
- 6) anti-corruption restrictions;
- 7) prevention and resolution of conflicts of interest.

6.10.1 Anti-corruption monitoring

6.10.1.1 Sources of anti-corruption monitoring include legal statistics and reports from individuals and legal entities, information from non-governmental and international organizations, sociological survey data and mass media publications, as well as other sources of information not prohibited by law.

6.10.1.2 The results of anti-corruption monitoring may serve as grounds for conducting an analysis of corruption risks and for improving measures aimed at developing an anti-corruption culture.

6.10.2 Internal analysis of corruption risks

6.10.2.1 The Company conducts an internal analysis of corruption risks and, based on its results, takes measures to eliminate the causes and conditions conducive to corruption offences. The standard procedure for conducting an internal analysis of corruption risks is determined by the authorized anti-corruption body.

6.10.3 Development of an anti-corruption culture

6.10.3.1 An anti-corruption culture is developed through a set of educational, informational and organizational measures.

6.10.4 Development of and compliance with anti-corruption standards

6.10.4.1 Anti-corruption standards are a system of recommendations established for the Company's activities and aimed at preventing corruption.

6.10.4.2 The objectives of developing anti-corruption standards are:

- 1) developing sustainable anti-corruption conduct among persons working in a distinct sphere of public relations;
- 2) timely detection of manifestations of corruption and prevention of their adverse consequences.

6.10.5 Financial control

6.10.5.1 The Company continuously complies with the requirements of the Law of the Republic of Kazakhstan "On Combating Corruption", including requirements relating to financial control measures.

6.10.6 Anti-corruption restrictions

6.10.6.1 Officers shall confirm in writing their acceptance of anti-corruption restrictions by signing the form in Appendix No. 3 to the Policy.

6.10.6.2 Consent to the acceptance of anti-corruption restrictions shall be recorded in writing by the Human Resources and Payroll Department.

6.10.7 Prevention and resolution of conflicts of interest

6.10.7.1 Prevention and resolution of conflicts of interest are governed by the Company's internal documents and procedures.

6.11 Liability

6.11.1 Officers and employees bear criminal, administrative, civil and disciplinary liability for corrupt practices and corruption offences in accordance with the legislation of the Republic of Kazakhstan.

6.11.2 Persons to whom appropriate liability measures have been applied for corruption offences are not released from the obligation to compensate the Company for material damage except pursuant to a court decision that has entered into legal force.

6.11.3 Officers and heads of the Company's structural units, within their authority, as well as heads of third parties—counterparties acting on the Company's instructions under contractual relations or on the instructions of a superior body (auditors, agents, consultants, etc.)—are responsible for organizing and coordinating activities to implement the provisions established by the Policy.

6.11.4 Officers bear liability in accordance with the law for failure to perform or improper performance of the requirements established by the anti-corruption legislation of the Republic of Kazakhstan, including non-compliance with anti-corruption restrictions.

6.11.5 In performing their official duties, officers and employees of the Company shall:

- familiarize themselves with the Policy, sign an undertaking to comply with the Policy in accordance with Appendix No. 1 to the Policy, and submit it to the HR&PRD;
- sign the Consent to Accept Anti-Corruption Restrictions and Confirm the Accuracy of Information form in accordance with Appendix No. 3 to the Policy and submit it to the HR&PRD;
- be guided by the Company's internal anti-corruption documents and by the records and guidance notes of the Compliance Service concerning compliance with the legislation of the Republic of Kazakhstan in the field of anti-corruption;
- take compliance with the Policy into account when assessing an employee's business qualities, including when appointing the employee to a higher position and resolving other personnel matters;
- strictly comply with the restrictions and requirements established by the Policy, including those concerning the giving and receiving of gifts; representation expenses; charitable and sponsorship activities;

participation in political activities; interaction with representatives of the state, persons subject to the Law of the Republic of Kazakhstan "On Combating Corruption", public organizations, counterparties, intermediaries and third parties; avoidance of conflicts of interest; and reporting.

6.11.6 In performing their official duties, officers and employees of the Company shall strictly observe the categorical prohibition on the following actions:

- participating in corrupt practices, including offering, promising or giving bribes to persons subject to the Law of the Republic of Kazakhstan "On Combating Corruption";
- requesting and receiving bribes (commercial bribery);
- participating in the commercial bribery of counterparties or in commercial bribery by counterparties, employees/officers;
- making payments to facilitate administrative, bureaucratic or other formalities in any form, including cash or cash equivalents, valuables, services or other property or non-property benefits, to or from any persons or organizations, including commercial and non-commercial organizations, public authorities and local self-government bodies, and persons subject to the Law of the Republic of Kazakhstan "On Combating Corruption", for the purpose of obtaining a benefit for themselves, the Company or third parties.

6.11.7 In performing their official duties, officers and employees shall strictly observe the categorical prohibition on requesting and receiving bribes from the Company's counterparties and other third parties and shall comply with anti-corruption requirements and restrictions established by other internal documents of the Company, insofar as they do not conflict with the Policy.

6.11.8 When interacting with counterparties, employees of the Company shall establish and maintain business relations with counterparties that conduct business in good faith and honestly, care about their own reputation, demonstrate support for high ethical standards in their activities, and implement their own anti-corruption measures.

6.11.9 The HR&PRD is responsible for recording in writing the acceptance by officers of anti-corruption restrictions and for publishing information in accordance with the requirements of anti-corruption legislation.

6.11.10 The responsible structural unit is responsible for keeping this Policy up to date.

6.11.11 Contract initiators are responsible for including in contracts with counterparties the anti-corruption clause in the form provided in Appendix No. 4 to the Policy, unless another form of clause is provided in procurement contract templates under the Procurement Procedure of Samruk-Kazyna JSC and organizations in which fifty percent or more of the voting shares (participatory interests) are directly or indirectly owned or held in trust by Samruk-Kazyna JSC, the Supplier Code in accordance with Appendix No. 5 to the Policy, and the sanctions clause in the form established by Samruk-Kazyna JSC.

6.12 Final provisions

6.12.1 In order to comply with international standards of business ethics and ensure openness and transparency in doing business, employees/officers of the Company shall notify the Company's Compliance Service of all cases in which they are induced to commit corruption offences, in accordance with the Company's internal documents.

6.12.2 If there are doubts regarding the legality of actions by other employees/officers of the Company or counterparties, possible corrupt practices or other corruption offences, including theft, fraud, bribery, commercial bribery, conflicts of interest and other matters, an employee/officer, counterparty, shareholder or other person may report their concerns to the Company's Compliance Service through open dialogue, including anonymously.

7. Records

7.1 Table 3 sets out the records generated under this Policy, which shall be managed in accordance with the requirements of the Policy.

Table 3. List of records

No.	Name	Record form	Responsibility for maintaining records	Storage		Frequency of record preparation
				Location	Retention period	
1	Form "Undertaking to Comply with the Anti-Corruption Policy"	Appendix No. 1 to the Policy	HR&PRD	Personnel file	in accordance with the personnel file retention period	As completed
2	Form "Gifts and Hospitality Register"	Appendix No. 2 to the Policy	Compliance Service	Compliance Service	On an ongoing basis	As entries are made
3	Form "Consent to Accept Anti-Corruption Restrictions"	Appendix No. 3 to the Policy	HR&PRD	Personnel file	in accordance with the personnel file retention period	As completed
4	Form "Anti-Corruption Clause"	Appendix No. 4 to the Policy	Interested structural units – contract initiators	At the place where contracts are stored	in accordance with the contract retention period	As contracts are concluded
5	Form "Supplier Code"	Appendix No. 5 to the Policy	Interested structural units – contract initiators	At the place where contracts are stored	in accordance with the contract retention period	As contracts are concluded

8. Review, amendment, storage and distribution

8.1 Review, amendment, storage and distribution of the Policy shall be carried out in accordance with the requirements of documented procedure DP-02 "Document Management".

8.2 The original hard copy of the Policy shall be stored by the Company's BPMD. Controlled hard copies of this Policy shall be prepared and stored by the structural units (persons) responsible for the Integrated Management System at the Company's branches.

8.3 A scanned version of the Policy shall be posted on the Company's Intranet portal (<http://portal.ica.kz/Default.aspx>).

8.4 Registered hard copies of this Policy shall, where necessary, be distributed to all structural units of the Company.

8.5 Registered hard copies made from the "Controlled Copy" shall, where necessary, be distributed by the structural units (persons) responsible for the Integrated Management System at the branches to all structural units of the Company's branches.

Appendix No. 1

Form "Undertaking to Comply with the Anti-Corruption Policy"

*Use this form to confirm that you have carefully read and understood, and undertake in good faith to comply with, the requirements established by the Anti-Corruption Policy of Intergas Central Asia JSC.
The completed and signed undertaking form shall be filed by the HR&PRD in the employee's personnel file.*

**Undertaking
to comply with the Anti-Corruption Policy
of Intergas Central Asia JSC**

Please tick the appropriate boxes

- ☐ I confirm that I have read and understood the Anti-Corruption Policy of Intergas Central Asia JSC (hereinafter referred to as the Policy).
- ☒ I undertake to strictly comply with the requirements established by the Policy, including:
 - ✓ not to participate in corrupt practices directly or indirectly, personally or through third-party intermediaries, including not offering, giving, promising, requesting or receiving bribes or facilitation payments in any form (incentive payments), including in the form of money, valuables, services or other benefits, to or from any persons or organizations, including commercial organizations, public authorities and local self-government bodies, Kazakhstani and foreign public officials, private companies and their representatives.
 - ✓ to refrain from conduct that may be interpreted by others as a willingness to commit or participate in a corruption offence in the interests of or on behalf of the Company.
 - ✓ to immediately inform my immediate supervisor and the person responsible for monitoring compliance with the Policy:
 - of cases where an employee is induced to commit corruption offences;
 - of information that becomes known to the employee concerning corruption offences committed by other employees, the Company's counterparties or other persons;
 - of the possibility of a conflict of interest arising or an actual conflict of interest involving the employee.
- ☐ I have been informed that if I violate the anti-corruption requirements of Kazakhstani or other applicable legislation, as well as the Policy, I may be subject to civil, administrative and criminal liability, including removal from my position, in accordance with the procedure established by the legislative acts of the Republic of Kazakhstan.
- ☐ I have been informed of the possibility of reporting to the Samruk-Kazyna JSC Hotline and the Company's Compliance Service any concerns regarding the legality or ethical nature of my own actions, as well as the actions, omissions or proposals of other employees, counterparties or other persons interacting with the Company.
- ☐ It has been explained to me that no employee of the Company, including myself, will be subject to sanctions or persecution by the Company if they report a suspected case of corruption or refuse to give or receive a bribe, engage in commercial bribery or otherwise facilitate bribery, including where such refusal results in lost profit or the Company not obtaining commercial or competitive advantages.



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- ☐ It has been explained to me that if I have additional questions regarding the principles and requirements of the Policy and applicable anti-corruption legislation, I may contact the Company's Compliance Service.

Please sign here

____ " ____ " ____ 20____
(Full name, Signature)



Appendix No. 2

Form "Gifts and Hospitality Register"

Gifts and Hospitality Register Form

No. item	Date hospitality was provided / gift was received	Full name and position of the person submitting the notification of receipt of a gift	Name of gift, description of hospitality	Full name and position of the person who received the gift	Name / full name of the giver	Special notes
1	2	3	4	5	6	7

Appendix No. 3

Form "Consent to Accept Anti-Corruption Restrictions"

Consent to Accept Anti-Corruption Restrictions Form

I, _____,
(surname, first name, patronymic)

(specify the position of the person who is an officer and/or a person performing managerial functions)²

(or specify if the consent is provided by a person who is a candidate for a position involving the above functions)

Intergas Central Asia JSC _____

hereby accept the anti-corruption restrictions under the Law of the Republic of Kazakhstan "On Combating Corruption" concerning:

1) the inadmissibility of joint service (employment) of close relatives, spouses and relatives by marriage, including within the same structural unit, and of having close relatives, a spouse and/or relatives by marriage under direct supervision, or in different units where the position is functionally linked (through business processes and procedures) with positions held by their close relatives, spouses and relatives by marriage;³

2) the use of official and other information not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;

3) the acceptance of material remuneration, gifts or services for actions (omissions) in favor of the persons providing them, where such actions fall within the official powers of the persons referred to in the first paragraph of this clause or where those persons, by virtue of their official position, may facilitate such actions (omissions).⁴

²According to the Law, a person performing managerial functions in a state organization or quasi-public sector entity is a person who permanently, temporarily or under special authority performs organizational and administrative or administrative and economic functions in such organizations;

administrative and economic functions mean the right, granted in accordance with the procedure established by the laws of the Republic of Kazakhstan, to manage and dispose of property carried on the organization's balance sheet;

a person equated to persons authorized to perform state functions means a person performing managerial functions in a state organization or quasi-public sector entity, as well as a person authorized to make decisions on organizing and conducting procurement, including public procurement, or responsible for the selection and implementation of projects financed from the state budget and the National Fund of the Republic of Kazakhstan, holding a position not lower than the head of an independent structural unit in such organizations;

³According to the Law, close relatives mean parents, children, adoptive parents, adopted children, full and half siblings, grandparents and grandchildren; relatives by marriage mean full and half siblings, parents and children of a spouse.

⁴Family members of a person are not entitled to receive material remuneration, gifts or services provided for actions (omissions) of that person in favor of the persons providing such material remuneration, gifts or services, where such actions (omissions) fall within that person's official powers or where, by virtue of their official position, that person may facilitate such actions (omissions). According to the Law, family members of a person mean their spouse, parents, children, including adult

During my employment, I undertake not to engage in activities incompatible with the performance of my employment functions, namely:

1) not to independently participate in the management of a business entity unless management of or participation in the management of a business entity forms part of my official duties in accordance with the laws of the Republic of Kazakhstan, and not to facilitate the satisfaction of the material interests of organizations or individuals through the unlawful use of my official powers for the purpose of obtaining property or other benefits;

2) not to engage in entrepreneurial activity, except for the acquisition and/or disposal of units of open-ended and interval unit investment funds, bonds on an organized securities market, and shares of commercial organizations (ordinary shares in an amount not exceeding five percent of the total number of voting shares of the organizations) on an organized securities market;

3) not to engage in other paid activities, except teaching, scientific and other creative activities.

I, (full name) _____, within 30 (thirty) calendar days from the date of assuming office and/or within 30 (thirty) calendar days from the date of acquisition, undertake to transfer into trust management property belonging to me the use of which generates income, including shares (participatory interests in the charter capital) in the charter capital of commercial organizations, except for money, bonds, units of open-ended and interval unit investment funds lawfully belonging to me, as well as property transferred for lease, and to submit to the human resources service a notarized copy of the notarized property trust management agreement.

I am aware of the liability established by the applicable legislation of the Republic of Kazakhstan for failure to comply with the restrictions and prohibitions established by the anti-corruption legislation of the Republic of Kazakhstan.

Full name
date

_____ signature

children, and persons who are dependent on and permanently reside with that person.

Appendix No. 4

Form "Anti-Corruption Clause"

Anti-Corruption Clause Form

1. Intergas Central Asia JSC (hereinafter referred to as the Company) informs the other party to the contract (hereinafter referred to as the counterparty) of the principles and requirements of the Company's Anti-Corruption Policy (hereinafter referred to as the Policy). By signing the Contract, the counterparty confirms that it has familiarized itself with the Policy posted on the Company's official website.

2. The counterparty undertakes to comply with and ensure compliance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan, not to commit corruption offences provided for by international instruments applicable for the purposes of the Contract and by foreign anti-corruption legislation, and to comply with the assurances set out in this clause.

3. The counterparty confirms that it is not a state-related person and does not have any persons subject to the Law of the Republic of Kazakhstan "On Combating Corruption" among its officers, employees or direct or indirect owners. The counterparty undertakes to immediately inform the Company in writing of all cases where any person subject to the Law of the Republic of Kazakhstan "On Combating Corruption" becomes an officer or employee of the counterparty or acquires a direct or indirect ownership interest in the counterparty's organization.

4. In performing their obligations under the Contract, the parties and their employees shall not pay, offer to pay or authorize the payment, directly or indirectly, of any money or valuables to any person in order to influence that person's actions or decisions for the purpose of obtaining any improper advantage or for any other improper purpose.

5. In performing their obligations under the Contract, the parties and their employees shall not engage in actions classified under the legislation applicable for the purposes of the Contract as giving/receiving a bribe or commercial bribery, nor in actions violating applicable legislation and international instruments on combating the legalization (laundering) of proceeds of crime.

6. Each party to the Contract shall refrain from incentivizing employees of the other Party in any manner, including by providing money, gifts, free works (services) or by other means that place the employee in a position of dependence and are aimed at ensuring that the employee performs any actions in favor of the incentivizing party.

7. If a party has reason to suspect that any anti-corruption condition has been or may be violated, that party shall notify the other party in writing.

8. In the written notice, the party shall refer to facts or provide materials that reliably confirm or provide reasonable grounds to believe that the counterparty or its employees have violated or may violate any provision of these conditions by actions classified under applicable law as giving or receiving a bribe or commercial bribery, or by actions violating applicable legislation and international instruments on combating the legalization of proceeds of crime.

9. The counterparty undertakes in good faith to provide the Company with assistance and cooperation in the event of an actual or possible violation of the requirements of this Anti-Corruption Clause.

10. To report violations of the requirements, the counterparty shall use the Samruk-Kazyna JSC Hotline, information about which is posted on the Company's official website.

Note: amendments and/or additions to the form of the Anti-Corruption Clause may be made by agreement of the Parties to the Contract.

Appendix No. 5

Form "Supplier Code"

Supplier Code
Intergas Central Asia JSC**1. Purpose**

1.1. The Supplier Code of Intergas Central Asia JSC (hereinafter referred to as the Company) contains the minimum standards that the Company requests be observed and respected in the course of joint commercial activities with the Company.

1.2. Sustainable business development is a key foundation of the Company's strategy, which is aimed at responding decisively to the social needs and expectations of the Company's stakeholders.

2. General provisions

2.1. The standards set out in the Code reflect the Company's expectations of the Supplier with which the Company works, including its subsidiaries and affiliates, as well as other parties with which the Supplier does business, including all of its employees (both permanent and temporary).

2.2. The Company's Supplier shall comply with the legislation of the Republic of Kazakhstan, other applicable legislation, the Company's internal documents and, in particular, the principles set out in this document.

2.3. All actions related to business information and reporting shall be performed honestly and accurately and shall comply with all applicable laws governing their performance and accuracy.

2.4. The Supplier shall not issue press releases or other publications concerning its relationship or agreements with the Company without the prior written consent of the Company's authorized representative under the relevant contract.

2.5. The Supplier is responsible for distributing this Code, familiarizing its employees with it, and carefully monitoring their compliance with its provisions.

3. General principles

The Company's Supplier shall comply with the following:

- not permit corruption offences in its activities;
- prohibit its employees, representatives and co-performers under contracts with the Company from engaging in commercial bribery and other corrupt practices;
- eliminate all forms of unlawful forced labor;
- eliminate child labor;
- eliminate all forms of discrimination, including in employment and labor activities;
- comply with regulatory legal acts concerning the minimum wage;
- comply with the labor legislation of the Republic of Kazakhstan and/or another country in which it operates.

4. Anti-corruption requirements

4.1. All forms of corruption, including extortion, bribery, facilitation payments, fraud, money laundering and nepotism in the Supplier's activities are strictly prohibited.

4.2. If the Company has objective grounds for suspicion and evidence that the Supplier has violated the requirements of this Appendix, such violation shall constitute a material breach of the Contract,

and the Company shall be entitled to suspend payments or terminate this Contract without prejudice to the Company's rights under this Contract or the legislation of the Republic of Kazakhstan. In addition, if any such violation results in a criminal offence for the Company, this Contract shall be immediately suspended and/or terminated upon notice to the Supplier, notwithstanding any right to remedy such violation that may be provided for in other provisions of this Contract.

4.3. For the implementation of the above requirements, the Supplier shall ensure that any individual or legal entity engaged by the Supplier to provide services under this Contract acts solely on the basis of a written agreement imposing responsibilities and obligations similar to those imposed on the Supplier under this Appendix; the Supplier shall remain responsible for such persons' compliance with and performance of these conditions and shall be directly liable to the Company in the event of their breach.

4.4. The Supplier undertakes to indemnify the Company and its direct and indirect shareholders, directors (this requirement does not apply to shareholders of a company listed on a stock exchange), officers and employees for all losses, including any civil or criminal sanctions or fines incurred as a result of the Supplier's breach of the provisions of this Supplier Code.

4.5. The Supplier and any individuals or legal entities engaged by the Supplier to perform obligations under the Contract, including their employees, agents, consultants, contractors and subcontractors:

- shall not offer, promise, give, demand or receive bribes or other corrupt payments, including to any public official;
- shall not, intentionally or negligently, take actions that may result in the Supplier or the Company, or any of their direct or indirect shareholders, directors, officers or employees, violating the anti-corruption legislation of the Republic of Kazakhstan;
- shall disclose if a public official or their close relative has a direct or indirect property interest/control in the Supplier's company (this requirement does not apply to shareholders of a company listed on a stock exchange);
- shall inform the Company whether the Supplier currently employs or in the future becomes the employer of any person holding a responsible public office or persons equated to such persons, and shall immediately notify the Company of any changes in such relationships;
- shall accept payments from the Company only if they are made by non-cash transfer or another traceable means of payment to the Supplier's bank account in the country of the Supplier's registration or in the country where the procurement results are delivered;
- shall immediately notify the Company of any allegations of fraud, bribery, corruption or other unlawful activity made against the Supplier in judicial, arbitration or administrative proceedings, or of any investigation into such allegations at any time during the term of this Contract;
- if the Company has reasonable grounds to suspect a violation (or possible violation) of the legislation of the Republic of Kazakhstan, shall cooperate in good faith with the Company and its representatives to establish whether such violation has occurred;
- agree that an inspection may be conducted only by employees of the Company or by an independent professional organization engaged by the Company under an appropriate agreement. All expenses associated with the inspection shall be borne by the Company, except where the inspection identifies a material breach of this Contract by the Supplier. In that case, all expenses associated with the inspection shall be borne by the Supplier.

4.6. The Supplier shall impose a complete prohibition on its employees offering, requesting, providing or accepting, directly or indirectly, payments, gifts or privileges in exchange for favorable treatment for the purpose of influencing a transaction or obtaining personal or business advantages. This requirement applies both to employees and to family members of the Supplier's employees and its co-performers.

4.7. The Supplier shall comply with the principles of fair competition and the free market. Business decisions shall not be made with regard to or under the influence of personal relationships and interests.

4.8. The Supplier shall implement an anti-corruption program based on the legislation of the Republic of Kazakhstan and international standards. The program, including appropriate practical and informational training, shall be transparent and effective.

4.9. The Company's Supplier shall make every effort to identify and prevent situations involving an actual or potential conflict of interest between the Supplier's employees and the Company's employees or their relatives that could adversely affect their business reputation or decision-making.

4.10. The Supplier undertakes to ensure disclosure to the Company and verification of information on all subcontractors and affiliates, as well as information on the registration of ultimate beneficial owners in offshore jurisdictions.

4.11. The Supplier is prohibited from paying travel, accommodation, gift, hospitality, entertainment and charitable contribution expenses on behalf of the Company.

5. Conflict of interest

5.1. The Supplier shall inform the Company of any situations that may constitute a conflict of interest and may affect business relations, and shall prevent such situations.

5.2. In conducting its activities, the Supplier shall make decisions solely on the basis of objective criteria. Any factors capable of influencing the Supplier's decision-making due to a conflict of personal, commercial or other interests shall be excluded from the outset.

5.3. If an employee of the Supplier is a relative or relative by marriage of an employee of the Company and this may give rise to a conflict of interest in the performance of the Contract or in business relations, the Supplier shall inform the Company's management.

6. Human rights and working conditions

6.1. The Supplier shall provide all employees with proper working conditions and ensure the observance of all employees' labor rights.

6.2. Any discrimination is prohibited regardless of the grounds, including with respect to employment and labor activities, sex or gender, nationality, citizenship, race, skin color or ethnicity, religion, age, language, marital status, social and parental status, property and official status, membership in public associations and political motives, pregnancy, disability, as well as other circumstances unrelated to the employee's professional qualities and work performance.

6.3. The Supplier shall not require employees or prospective employees to undergo medical tests, including pregnancy tests, except where required by applicable law or regulations or where necessary to ensure workplace safety. The Supplier shall not permit discrimination based on test results.

6.4. The Supplier shall create an accessible environment for persons with disabilities in accordance with legal requirements.

6.5. The Supplier is prohibited from using forced labor, prison labor, trafficking in persons or purchasing commercial sexual services. All forms of forced labor, including bonded labor, servitude (including slavery) or other forms of compulsory labor, are prohibited. Supporting or participating in any form of trafficking in persons or forced labor through threats, use of force, fraudulent statements or other forms of coercion is prohibited.

6.6. It is prohibited to employ persons below the minimum employment age established by applicable law. The Supplier shall not use child or minor labor except where the conclusion of an employment contract is permitted under applicable law.

6.7. All employees of the Supplier shall have a signed employment contract. The employment contract shall establish all essential conditions, including working hours, overtime compensation, notice period, wage amount and payment frequency, as well as other conditions required by applicable law.

6.8. The Supplier shall comply with regulatory legal acts concerning employees' working time and rest periods and other employer obligations.

6.9. The Supplier shall comply with the regulatory legal acts of the Republic of Kazakhstan concerning the minimum wage established by the legislation of the Republic of Kazakhstan. Overtime work, work on weekends and public holidays, or night work shall be paid at an increased rate in accordance with the terms of the employment or collective agreement and/or the employer's act.

6.10. The Supplier shall ensure that employees are able to know and fully understand their rights and obligations as employees in their native language or another language they understand.

6.11. Job descriptions shall be developed, updated and communicated to all employees and consultants.

6.12. No person shall be subjected to corporal punishment, unlawful detention, physical, sexual and/or psychological harassment.

6.13. The Supplier shall respect its employees' freedom of association in accordance with applicable law.

7. Occupational health and safety

7.1. The Supplier shall ensure that its activities are safe for the health of its employees, contractors and other persons, as well as for the safety of the Company's employees, on whose premises and facilities contractual activities are carried out.

7.2. The Company's Supplier shall ensure proper working conditions; employees shall be familiarized with occupational health and safety information and receive appropriate training, including fire safety, radiation safety, proper handling of chemicals and equipment, emergency preparedness and first aid.

7.3. Potential risks that may lead to accidents/injuries or occupational diseases among the Supplier's employees shall be assessed and controlled by taking appropriate preventive measures (for example, design, engineering, administrative controls, preventive maintenance, occupational safety procedures, ongoing safety training, and provision of personal protective equipment).

7.4. The Supplier shall take adequate measures to prevent or remedy the consequences and damage arising from accidents and injuries, as well as psychosocial illnesses, in order to minimize factors inherent in hazardous work. The Supplier shall provide its employees with appropriate personal protective equipment at no additional cost. Any incident or accident resulting in physical injury, as well as psychosocial illness, shall be documented and reported to the Supplier's senior management.

7.5. The Company actively works to continuously improve safety within the Company and ensure the safety of its employees, and requires the same from its business partners. When performing work at production sites, the Supplier shall comply with high occupational health and safety standards and shall be responsible for immediately reporting any emergency situation.

8. Environmental protection

8.1. The Company recognizes its social responsibility for environmental protection and supports environmental sustainability. The Company expects the Supplier to share its corporate commitment to proactively reducing carbon emissions, reducing water consumption and minimizing waste generation.

8.2. The Supplier shall implement and/or carry out measures that contribute to environmental conservation and reduce their adverse impact on natural resources to the greatest extent possible.

8.3. The Supplier shall limit the volume of harmful substances generated in the performance of the Contract and ensure disposal of such waste without causing significant harm to the environment.

8.4. The Supplier shall take measures to prevent the use of toxic substances. Where no alternative exists, the Supplier shall minimize the use of toxic substances and ensure their safe handling and disposal. With respect to other harmful substances, elements or restricted-use waste, the Supplier shall strictly comply with all applicable legal requirements.

8.5. The Supplier shall develop both environmentally protective technologies (for example, pollutant and carbon dioxide emissions control) and energy-saving and waste-recycling technologies, and shall implement logistics strategies that reduce their adverse environmental impact, especially in relation to storage, handling and transportation.

9. Confidentiality and data security

9.1. The Supplier shall protect confidential information and maintain the confidentiality of any information concerning the Company, its partners, business activities, contracts, projects, structure, financial position or operations unless specific written authorization for disclosure has been obtained.

9.2. The Supplier shall use systems that ensure the integrity and security of customer data and prevent leakage of confidential data.

9.3. The Supplier shall ensure emergency response and disaster recovery measures that protect data and ensure business continuity with respect to goods, works and/or services provided to the Company. Such measures shall include implementation procedures and, at a minimum, continuity and recovery plans for adverse weather conditions or other natural disasters, shortages of labor or other resources, system and/or facility downtime or unavailability, power outages and communication outages.

9.4. The Supplier shall report any data security vulnerabilities to the Company and remedy them immediately.

10. Corporate ethics

10.1. The Supplier undertakes to act in accordance with national and international competition law and not to participate in price fixing, allocation of markets or customers, market sharing or collusion with competitors in tenders.

10.2. The Supplier undertakes not to facilitate, directly or indirectly, money laundering or terrorist financing.

10.3. The Supplier shall comply with national and international export control measures, as well as trade, economic and financial sanctions and embargoes applicable to its activities. The Supplier shall familiarize itself with trade restrictions applicable to its activities, including information on countries and organizations subject to sanctions, and shall comply with them.

10.4. The Supplier shall conduct its activities in accordance with the principles of responsibility and integrity. The Supplier shall use internal control systems to detect and prevent fraud and money laundering and measures for responding to such cases. Any instances of potential fraud capable of affecting the Company's activities shall be reported immediately.

11. Final provisions

11.1. The requirements of this Supplier Code form an integral part of the Contract.

11.2. By this document, the Company's Supplier undertakes to familiarize its employees with this Supplier Code.

11.3. The Supplier and/or its employees shall report to the Company any identified or suspected violation of the Supplier Code. This shall not be used against the Supplier and/or its employees if they act in good faith. If anyone receives information about, suspects, or witnesses any actions that violate the Supplier Code, the relevant information shall be provided to the Company through the communication channels specified on the website <https://intergas.kz>.



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I (full name) _____, acting on the basis of _____, hereby confirm that, as an authorized representative of the Supplier, I have carefully reviewed and understood the contents of this document and confirm that the Supplier acts in full compliance with this Supplier Code.

Full name _____
Name/Title _____
Date: _____
Signature: _____
Seal _____



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