

BUSINESS ETHICS

COMPLIANCE SERVICE

Anti-corruption

KMG's compliance system helps make sure all our operations are aligned with the laws, industry standards, and other regulatory requirements. Components of the compliance system are integrated into all aspects of our operations.

Internal anti-corruption policies and practices

KMG conducts its business in a fair and ethical manner, always guided by the principle of legitimacy. We strictly comply with all applicable laws and regulations, take all steps to prevent corruption, care about business reputation, and seek to implement high international standards of ethics.

The key areas of focus for KMG's Compliance Service are:

- anti-corruption;
- regulatory compliance and adherence to the standard norms of corporate and business ethics;
- insider information management;
- business reputation management;
- management of conflicts of interest.

In line with best global practices of corporate governance, KMG has the following internal documents on compliance:

- Anti-Corruption Policy;
- Confidential Informing Policy;
- Conflict of Interest Management Policy;
- Counterparty Due Diligence Policy;
- Internal Control Rules for Granting Access Rights to Insider Information and Preventing Information Misuse by Insiders;
- Code of Business Ethics;
- Regulations on the Compliance Service.

Compliance controls

In order to meet the standards of business conduct and ethics, the Compliance Service carries out due diligence of KMG's counterparties. This practice helps prevent signing contracts with those acting in bad faith while also reducing the risks of contractual violations.

The Compliance Service also screens candidates nominated to fill vacancies related to administrative and organisational functions. This is a way to enable the reliability and professionalism of the Company's management by reducing the possibility of corruption by highly ranked officers. One of the hiring criteria for new employees in the area of procurement is to successfully pass psychology and polygraph (lie detector) tests.

Key measures to combat corruption at KMG Group include conducting anti-corruption monitoring and performing an internal analysis of corruption risks. Based on analysis results, we adopt action plans to eliminate root causes and conditions conducive to corruption.

Since 2020, the Company requires employees across the board to declare any conflicts of interest. This contributes to the efficiency of conflict of interest management.

KMG Group employs a whistleblower hotline as an effective tool in combating violations. Furthermore, since KMG's securities are listed and traded on stock exchanges, the Compliance Service takes steps to prevent insider information misuse by those classified as insiders under the laws of Kazakhstan.

Regular initiatives are conducted to cultivate an anti-corruption culture within the Company. To mitigate compliance risks in corporate decisions, the Compliance Service reviews materials submitted for consideration by the Management Board and the Board of Directors of KMG.

Staff training

KMG is dedicated to fostering an anti-corruption culture among its employees. To that end, we provide anti-corruption training and make sure it is continuous, consistent, and up-to-date.

In 2024, a variety of activities, including workshops and meetings, were carried out to strengthen the anti-corruption culture, improve compliance, and enhance corporate governance. As part of the anti-corruption policy implementation, KMG focused on awareness-raising and training for its employees across various entities.

During the reporting period, KMG's Compliance Service assessed existing anti-corruption processes for compliance with ISO 37001 (Anti-Bribery Management Systems). Following this assessment, we developed an action plan to facilitate KMG's upcoming certification.

The Compliance Service actively engages in initiatives to foster and develop the anti-corruption culture, implying a strong commitment to zero tolerance for corruption. These include in-person training sessions and awareness-raising events for employees, along with the display of visual materials that explain the Company's anti-corruption policy requirements in accessible public areas. Furthermore, ongoing consultations are held with employees and managers, supplemented by anti-corruption meetings with the Group leadership and regular newsletters that keep everyone informed about legislative requirements.



Hotline

In order to quickly identify violations, prevent any negative implications, ensure compliance with applicable laws and internal regulations, maintain strong business reputation and public perception, and foster corporate culture, Samruk-Kazyna Group, including KMG and its subsidiaries and associates, have a centralised hotline in place operated by KPMG, an independent auditor.

Using the hotline, employees can anonymously report known facts of corruption, fraud, discrimination, and any other violations committed by employees and counterparties of KMG and its subsidiaries and associates.

The hotline contacts are available on the websites of KMG and its subsidiaries and associates, with measures taken to raise employee awareness about it.

We encourage everyone to come forward and report violations of the Code of Conduct, including cases of corruption, discrimination, unethical behaviour, and other offences. We guarantee confidentiality and anonymity in the processing of 100% of reports.

In 2024, the hotline received 115 reports, up 35% year-on-year. This growth reflects rising interest and engagement from employees and contractors, along with increased trust in both the hotline and the compliance function at KMG. The Company actively seeks to encourage employees and other persons to report any issues via the hotline.

Hotline

- Phone: +7 (800) 080 47 47
- WhatsApp: +7 (771) 191 88 16
- Internet portal: www.sk-hotline.kz
- E-mail: mail@sk-hotline.kz
- The hotline is run by KPMG as an independent operator.

Nysana Hotline

- Phone: +7 (800) 080 30 30
- WhatsApp: +7 (702) 075 30 30
- Internet portal: nysana.csc.kz
- E-mail: nysana@csc.kz
- The Nysana call centre is available 24/7 to accept free calls related to any social and labour violations.

Reports via the hotline



We are aware of the importance of fostering whistleblowing channels as the key sources of information about threatened or actual violations. It is our belief that in order for people to trust whistleblowing tools, all reports so received need to be considered comprehensively, in full, and without any bias.

Information on identified corruption risks

During the reporting period, KMG conducted an internal analysis of corruption risks associated with its internal regulations, and organisational and management processes.

The analysis identified corruption risks in both domains.

In line with the guidelines of the Anti-Corruption Agency of the Republic of Kazakhstan, the Company developed an action plan to address the causes and conditions that

contribute to the identified corruption risks. Additionally, we implemented measures to assess these risks for their inclusion in the Company's overall risk map.

Conflict of interest

The Company has established a process for disclosing information about conflicts of interest. The procedures and methods for such disclosure are outlined in the Conflict of Interest Management Policy for Employees and Officers. Furthermore, mandatory conflict of interest disclosures are required during the hiring process, when transferring to a higher position within another business unit, when changing job responsibilities, and in other relevant situations.

OMBUDSMAN OFFICE

One of the key roles of the Ombudsman Office is to make sure that KMG's practices are fair and that the interests of all the Company employees are observed. This is achieved through early dispute and conflict prevention and resolution, escalating systemic issues requiring action to relevant bodies and officers, and initiating proposals to stabilise conflict situations. KMG's Code of Business Ethics clearly states the principles stipulating that KMG employees and officers shall not tolerate discrimination against anyone on the basis of race, religion, nationality, gender, political or other affiliation, social origin, material position, job, language or other circumstances, as well as the granting of any privileges to individual employees based on the above characteristics.

KMG Ombudsman's activities are guided by Kazakhstan's laws and KMG's internal documents.

In 2024, the Ombudsman Office undertook efforts to raise awareness about the Code of Ethics among employees. It also held educational meetings with

workers from the Group's major enterprises, including PetroKazakhstan Oil Products, Karazhanbasmunai, Mangistaumunaigaz, Ozenmunaigas, Atyrau Refinery, and others. The Nysana call centre's hotline received 112 messages related to KMG, resulting in activities to address the issues raised in relation to labour rights and business ethics, along with updates to the Code of Ethics to reflect the Company's corporate values and sustainability commitments. KMG's Ombudsman Office monitors timely review of reports received via the hotline by relevant units. In the reporting year, the Ombudsman also engaged with external organisations and participated in events relevant to their area of expertise.

The Ombudsman Office provided consultations and recommendations to those who submitted oral reports by phone or at personal meetings. In response to these reports, the Office took action to address the issues raised, including efforts to restore violated rights and protect lawful interests.

