




**Branch of KMG Kashagan B.V.
Private Company with Limited Liability in the Republic of Kazakhstan**

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Anti-Corruption and Fraud Policy PCLL KMG Kashagan B.V.

Astana, 2025.

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1. Objective and Scope

1.1. This Anti-Corruption and Fraud Policy of the Private Limited Liability Company “KMG Kashagan B.V.” (hereinafter - the Policy) has been developed in accordance with the applicable norms of the applicable anti-corruption legislation of the Netherlands, the Law of the Republic of Kazakhstan "On Combating Corruption", as well as the requirements stipulated by the Corporate Standard for the Compliance Function of JSC NWF “Samruk-Kazyna” dated 12/21/2023, No. 60/23 in the Fund's portfolio companies.

1.2. The Private Company with Limited Liability “KMG Kashagan B.V.” and its Branch in the Republic of Kazakhstan (hereinafter – the Company) declare their categorical rejection of unfair and illegal ways of doing business and voluntarily assume additional obligations in the field of prevention and prevention of corruption, recommended by Kazakhstani, foreign and international bodies and organizations

1.3. This Policy discloses the goals and objectives of the Company in the field of anti-corruption, defines the legal basis and key principles of such combating, describes the measures taken by the Company to prevent corruption, establishes the obligations of the members of the Board of Directors of the Company, Employees and other persons in the field of combating corruption, as well as liability for non-fulfillment (improper fulfillment) of the provisions of the Policy.

1.4. This Policy is designed to:

1) ensure compliance of the Company's activities with the requirements of Kazakhstan laws and applicable foreign laws regulating relations in the area of combating corruption, high standards of ethical business conduct;

2) minimize the risks of involvement of the Company and its Employees in corrupt activities;

3) form a common perception of the Company among members of the Board of Directors and the employees of the Company, shareholders, counterparties, representatives of state authorities, and other stakeholders denying corruption in any of its forms and manifestations;

4) create a local regulatory framework governing the activities of the Branch to counteract involvement in corruption.

1.5. The objectives of this Policy are:

1) to define the goals, objectives, and principles of the Company in the area of combating corruption and fraud;

2) to prevent, assist in the detection, suppression, and disclosure of unlawful acts, as well as to assist in the detection and identification of persons preparing, committing, or having committed fraudulent and corrupt acts;


3) to identify the main corruption and fraud risks and determine measures to minimize and/or eliminate them;

4) to form the corporate culture of the Company in order to counteract corruption and fraud;

5) to implement anti-corruption procedures in the Company on the basis of applicable anti-corruption laws and communicate them to the members of the Board of Directors and the Employees and other stakeholders;

6) to establish the obligation of the members of the Board of Directors and the Employees to comply with the principles, restrictions and requirements set forth in the Policy;

7) to provide information channels for reporting facts of corruption;

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8) to explain the measures taken in the Company to prevent corruption.

1.6. This Policy reflects the Company's commitment to high ethical standards of business conduct and maintenance of its business reputation. The Company recognizes that its reputation for honesty and integrity is one of its most valuable assets, believing that corruption is a threat to its business and values. The Company's firm stance on combating corruption is one of the fundamental principles of doing business.

1.7. The Company prohibits to the members of the Board of Directors and Employees to commit corruption offenses or bribery in any form, whether directly or through the involvement of third parties (Intermediation), worldwide. The Company openly declares non-acceptance of corruption and voluntarily assumes additional obligations in the area of prevention of corruption offenses.


1.8. The Company expressly prohibits to the members of the Board of Directors and Employees from making incentive payments, including to Politically Exposed Persons, on behalf of the Company, including making such payments through intermediaries.

1.9. This Policy applies to members of the Board of Directors and full-time employees and to employees of the Company's outstaffing sector, irrespective of their position. The rules of the receiving party shall apply to seconded employees of the Company. The norms of this Policy also apply to third parties - contractors working within the framework of contractual relations.


1.10. This Policy is posted on the Company's official website on the Internet and in the electronic database of documents.

2. Terms and Abbreviations


Term Abbreviation	Definition
Anti-Corruption Policy	activities aimed at creating an effective anti-corruption system
Close relatives	Parents (parent), children, adoptive parents, adopted, full- and half-blood siblings, grandfather, grandmother, grandchildren
Bribe	1) material valuables (objects or money) or any property benefit or services for an action (or, conversely, inaction), in the interests of the bribe-giver or another third party in favor of the Politically Exposed Person, which this Politically Exposed Person could or should have done by virtue of his/her official position; 2) material valuables (items or money) or any property benefit or services for an action (or, on the contrary, inaction), in the interests of the bribe-giver or other third party in favor of a member of the Board of Directors and an Employee of KMGK
Stakeholder	1) individuals, legal entities, groups of individuals or legal entities that influence or may be influenced by the activities of KMGK and/or the Organization, their products or services and related actions by virtue of legislation, concluded agreements (contracts) or indirectly (in a vicarious manner); 2) the main representatives of stakeholders are shareholders, employees, customers, suppliers, government agencies, subsidiaries, bondholders, creditors, investors, public organizations, and the population of the regions where the Fund or the Organization operates.

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Laws	a set of normative legal acts of the Republic of Kazakhstan adopted in the prescribed manner
Commercial bribery	Illegal transfer to a person and receipt by a person performing managerial functions in a commercial or other organization of money, securities or other property, as well as unlawful provision of services of a property nature for the use of his or her official position, as well as for general patronage or permissiveness in service in the interests of the person who performs the bribery
Compliance system	a system of internal control over the Company's processes, their policies, procedures, measures taken for the Company to ensure the achievement of anti-corruption goals, including the implementation of an effective set of preventive ("precautionary") measures to prevent violations of applicable anti-corruption laws, requirements of industry regulations and the Company's internal documents, as well as measures to detect and suppress corruption and other violations (abuses) in order to ensure high professional and ethical standards, minimize the risks of non-compliance with the laws of the Republic of Kazakhstan and applicable international law, and prevent significant financial damage or loss of the Company's reputation
Counterparty	a legal entity or an individual, regardless of citizenship, residence or place of registration, being a party to a contract concluded with the Company, who has assumed certain obligations as a Potential Supplier (executor or Customer)
Conflicts of Interest	any situations or circumstances in which the Personal benefit or activities of members of the Board of Directors and an Employee of the Company conflict with the interests of the Company or may potentially conflict with them and thereby may lead to improper performance of their official duties and affect the objectivity of decisions on matters relating to the Company
Corrupt practices	Offering, promising, giving, demanding and/or receiving an illegal benefit, tangible and intangible, in any form, directly or through intermediaries, including in the form of bribes and commercial bribery; and/or Mediation in the performance of a corrupt act; and/or abuse of official position, abuse of authority, as well as other illegal use by an Employee or Official, as well as by another person of his/her official position contrary to the legitimate interests of the Company, including for the purpose of obtaining an illegal benefits tangible and intangible, for oneself or third parties, or the illegal provision of such benefits to the specified person by other individuals
Acts of corruption	unlawful use of an official position by a member of the Board of Directors or an Employee of his/her official position related to personal benefit or presentation of benefit to third parties to the detriment of the interests of the Company, the state, for which the law does not establish administrative or criminal liability, but which violates the provisions of this Policy
Corruption offense	an unlawful culpable act (action or inaction) having signs of corruption, related to the use of one's official position or deliberate failure to perform one's official duties, in order to obtain personal benefit, which facilitates the commission of corrupt acts or concealment of an offense already committed, for which the law establishes administrative or

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	criminal liability
Corruption risk	possible preconditions for the emergence of causes and conditions conducive to the commission of corruption offenses
Personal benefits	personal property benefits or interest in obtaining personal benefits from the Company, not related to the material security provided by the Branch for the Employees, receipt of salary and bonuses, remuneration, compensations, various types of social support provided by the Branch
Fraud	theft of another's property or acquisition of the right to another's property by deceit or breach of trust
Acts of fraud	intentional acts or omissions of individuals and/or legal entities to gain benefit at the expense of the Company, the Branch and/or cause material and/or non-material damage to it
Politically exposed person	<p>1) Civil servant - a citizen of the Republic of Kazakhstan, holding a public position in a state body and exercising official powers for the purpose of realization of tasks and functions of the state, paid from the republican or local budgets or from the funds of the National Bank of the Republic of Kazakhstan in accordance with the procedure established by the laws of the Republic of Kazakhstan;</p> <p>2) Official - a person who permanently, temporarily or by special authority performs the functions of a representative of authorities or performs organizational, administrative or administrative and economic functions in state bodies;</p> <p>3) Foreign official - an official of a foreign state, including members of a foreign public assembly, officials of international organizations, members of an international parliamentary assembly, judges of a foreign state and officials of an international court, as well as officials in the armed forces and other military formations of a foreign state</p>
Countering fraud and corruption	activities of members of the Board of Directors or Employees within their authority to prevent (prevent) corruption and fraud, including the formation of an anti-corruption culture, the identification, prevention, and elimination of causes and conditions conducive to the commission of corruption offenses, as well as assistance in the identification, suppression, disclosure, and investigation of corruption and fraudulent activities and their elimination consequences
Employee	<p>1) an individual who has an employment relationship with the Branch and directly performs work under an employment contract.</p> <p>2) an individual engaged on the basis of an employment contract concluded with the sending party in accordance with the contract for provision of personnel services (outsourcing)</p>
In-law relatives	full and half siblings, parents and children of the spouse
Incentive payments	payments in favor of Politically Exposed Persons to expedite routine official actions (e.g., issuance of permits, licenses, or other official documentation; issuance of visas, work permits, and other immigration documentation; acceleration of permission to release goods from customs; acceleration of state registration of real estate or vehicles; acceleration in the provision of utilities or other services (e.g., telecommunications, security), etc.).
Structural division	a division of the Branch responsible for carrying out a certain type of activity and reflected in the organizational structure of the Branch (department)

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Embezzlement	actions committed with a mercenary purpose, unlawful gratuitous seizure and/or reversion of another's property in favor of the perpetrator or other persons, causing damage to the owner or other possessor of this property
CEO	General Director of the Company's Branch in the Republic of Kazakhstan
CEO-1	the level of management that is subordinate to the position of the General Director of the Branch (CEO) in accordance with the organizational structure (Deputy General Director)
CEO-2	the management level, subordinate to CEO-1 in accordance with the organizational structure (director of a structural unit, department, service)


3. Responsibility and duty

3.1. The Board of Directors of the Company, when implementing the compliance function, is responsible for:

- 1) ensuring the provision of the necessary resources for the effective functioning of the compliance system;
- 2) ensuring consistency of the anti-corruption and fraud policy and other internal documents in the field of compliance with the goals and strategy of the Company;
- 3) exercising control over the development and implementation of the compliance system in the Company and its effectiveness, as well as the sufficiency of the allocated resources for its effective functioning;
- 4) periodically, but at least 1 (one) time per year, to obtain information on the generation and functioning of the compliance system and on the measures taken in the field of combating corruption in the Company;
- 5) periodically, but at least 1 (one) time per year in assessing the achievement of compliance and anti-corruption goals based on an internal audit or third-party analysis;

3.2. The General Director of the Branch shall be personally responsible for control and implementation of the requirements set forth in this Policy, as well as being responsible for:

- 1) taking the necessary measures for the effective functioning of the compliance system and functions;
- 2) provision of operational control over the use of sufficient and appropriate resources for the effective functioning of the compliance system;
- 3) promoting a culture of compliance, anti-corruption, and intolerance of violations;
- 4) effective implementation of the requirements of the Company's anti-corruption policy, development of a compliance program and implementation of anti-corruption tools;
- 5) ensuring the integration of compliance system requirements into the Company's business processes;
- 6) informing about the provisions of compliance policies both within the Company and in relations with business partners;
- 7) involving the Company's employees in the ideas of the importance of effective anti-corruption efforts and compliance with the requirements of the compliance system;
- 8) ensuring continuous improvement of the compliance system;
- 9) timely taking measures to bring persons guilty of committing a corruption offense and persons assisting them to responsibility established by the legislation of the Republic of

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Kazakhstan, as well as taking necessary measures against employees whose actions (inactions) led to compliance violations.

3.3. Members of the Board of Directors/Employees shall bear criminal, administrative, civil, and disciplinary responsibility for committing fraudulent and corrupt acts in accordance with the applicable legislation.

3.4. Members of the Board of Directors/Employees who are subject to criminal, administrative, civil, and disciplinary liability for committing fraudulent and corrupt acts shall not be exempted from liability until full compensation for material damage.

3.5. Members of the Board of Directors/Employees, in the performance of their official duties, shall:

1) read the Policy and sign an Undertaking to comply with the Policy. Such an Undertaking shall be executed as an annex to the labor contract in the form according to Annex No.1 to the Policy;

2) be guided by the memo according to Annex No.2, which lists basic concepts and examples of inadmissible corrupt behavior;

3) take into account compliance with the Policy when assessing the Employee's business qualities, including in the case of appointment to a higher position, and when resolving other personnel issues;

4) strictly comply with the restrictions and requirements stipulated by the Policy, including those related to giving, receiving gifts; representation expenses, charitable and sponsorship activities; participation in political activities; interaction with representatives of the state, Politically Exposed Persons and public organizations, counterparties, intermediaries, third parties; avoidance of Conflict of Interest; keeping records;

5) immediately report to a Compliance Officer or contact the Hotline if they become aware of a committed or planned corruption offence.

6) receive training in the application of the Policy on Combating Fraud, Corruption, and internal procedures in this area, organized by the Compliance Officer.

7) strictly observe the categorical prohibition of the following actions:


- participate in corrupt practices, including offering, promising, giving bribes to Politically Exposed Persons;

- ask for and receive Bribes or offer or receive Commercial Bribery;

- participate in Commercial Bribery of Counterparties, be in any way interested in entering into a contract or agreement with a particular counterparty, unreasonably insist on engaging a particular counterparty (whether represented in a consortium or independently) and fail to consider the interests of the Company when selecting a counterparty;

- make payments to facilitate administrative, bureaucratic and other formalities in any form, including cash or cash equivalents, valuables, services or other benefits of property and non-property nature, to and from any person or organizations, including commercial and non-commercial organizations, authorities and local self-government bodies, Politically Exposed Persons, for the purpose of obtaining benefit for oneself, for KMGK/Branch or for third parties.

3.6. When interacting with Counterparties, Employees establish and maintain business relations with those Counterparties who conduct business relations in good faith and honesty, take care of their own reputation, demonstrate support for high ethical standards in conducting business activities, and implement their own anti-corruption measures. When conducting business meetings with Counterparties, conduct with the participation of at least two Employees as agreed upon with the direct supervisor.

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3.7. Members of the Board of Directors/Employees of the Company in the performance of their official duties must strictly observe the categorical prohibition to accept bribes from Counterparties and other third parties, as well as to initiate, offer and give a Bribe either personally or through intermediaries, whether Employees or other third parties.

3.8. Members of the Board of Directors/Employees in the performance of their official duties shall assume anti-corruption restrictions established by the applicable anti-corruption laws in accordance with Annex No. 4 to the Policy.

3.9. Employees of the Company, as well as members of the Board of Directors who are citizens of the Republic of Kazakhstan, shall submit declarations of assets and liabilities, income, and property within the terms and in accordance with the procedure established by the tax legislation of the Republic of Kazakhstan.

3.10. The Compliance Officer shall be responsible for:

1) implementation of a procedure for checking Counterparties in order to reduce the risk of involvement of the Company, Employees in corrupt activities and other unfair practices during relations with Counterparties (including collection and analysis of publicly available information on potential Counterparties, such as their reputation, length of time in the market, involvement in corruption scandals, etc.).

2) posting information on corruption prevention measures taken in the Company on the official website of the Company;

3) updating the Policy;

4) organization of in-person training in the form of training, as well as in absentee or distance learning by reading this Company, which is publicly available on the website of the Branch and internal resources;

5) recording consents to the adoption of anti-corruption restrictions by Employees;

6) maintaining and improving the Anti-Bribery Management System and improving the compliance function.

3.11. Initiators of contract conclusion (structural divisions) shall be responsible for the inclusion of an anti-corruption clause in the contracts concluded with Counterparties in accordance with the form provided for in Annex No.5 and coordination of the draft contract with the Compliance Officer.

3.12. The Human Resources Management Department is responsible for:

1) one-time submission to the Employees of declarations of income and property, assets, and liabilities upon conclusion of the employment contract;


2) taking action against Employees who violate the Policy in accordance with the legislation of the Republic of Kazakhstan.

4. Key Anti-Corruption Principles

4.1. Within the framework of its activities, the Company shall be guided by the following anti-corruption principles:

1) **Zero Tolerance Principle** (non-acceptance of corruption in any form or manifestation) - a complete prohibition for Employees, as well as other persons acting on behalf of the Company and/or in its interests, directly or indirectly, personally or through any intermediary to participate in corrupt practices regardless of business practices in a particular country;

2) **Tone from the Top Principle** - the Company managers shall set an example to the

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employees by their behavior to observe and promote high ethical standards of business conduct and non-acceptance of corruption in any of its manifestations;

3) **Due Diligence Principle** - taking a set of measures and actions aimed at obtaining necessary and reliable information about a counterparty to minimize the risk of business relations with counterparties that may be involved in corrupt activities or are tolerant of corrupt practices;

4) **Corruption Prevention Principle** - the Company takes preventive measures in advance to prevent corruption, i.e. introduction of elements of corporate culture, organizational structure, rules and procedures aimed primarily at identifying corruption risks and their minimization;

5) **Punishment Inevitability Principle** - the Company declares irreconcilable attitude to any forms and manifestations of fraud and corruption at all levels of corporate governance. Bringing guilty persons to responsibility shall be carried out regardless of their position and term of employment in the Branch and other relations with it in accordance with the procedure established by the laws and internal documents;

6) **Monitoring and Control** - the Company shall monitor the implemented procedures for prevention and combating corruption, control their compliance and regularly improve them;

7) **Corruption Prevention Cooperation** - the Company recognizes the general social nature of the problem of corruption and the need to counteract it both by means of measures implemented within the framework of the state policy and by means of forming intolerance to corruption on the part of Employees and contractors;

8) **Reliable Reporting Principle** - the Company shall strictly comply with the requirements of the laws and the rules of keeping accounting documents. Each fact of economic life is subject to registration in the primary accounting document. Misrepresentation or falsification of accounting, management, tax and other accounting data or supporting documents is not allowed;

9) **involvement of Employees in anti-corruption** - the Company aims to form a personal position of non-acceptance of corruption in all its forms and manifestations by employees. For this purpose, the Company shall take all necessary measures to implement the Policy at all levels of the organization and communicate its contents to its Employees as well as to other stakeholders. The Company promotes an anti-corruption culture among its Employees through regular training on the basic requirements of the Policy and its application in practice.

5. Types of Fraud and Corruption Offenses


5.1. The following types of fraudulent activities may occur in the Company:

5.1.1. Internal:

a) misrepresentation of financial statements - intentional acts committed by one or more persons from among Employees and/or management staff through illegal actions (omissions) to obtain illegal benefits;

b) misuse/appropriation/theft/embezzlement of the Branch's assets - embezzlement of funds, misuse of funds, theft and deliberate damage of fixed assets, inventory;

c) actions of a corrupt nature, abuse of official powers and exceeding of official powers - use of one's official powers and related opportunities for obtaining property benefits, violations in the procurement of goods/works/services, including forgery/falsification of documents, special overpricing or underpricing of goods/works/services in order to receive monetary

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rewards, expensive gifts or favorable services.

5.1.2. External:

1) actions committed by Counterparties for the purpose of obtaining additional profit, including evasion from payment of taxes and mandatory payments to the budget, as a result of which damage may be caused to the Branch and/or the state;

2) provision of knowingly false, altered, or distorted information by the Counterparties for the purpose of deception or misrepresentation and making profit at the expense of the Branch;

3) actions aimed at unauthorized penetrations into the information systems of the Company or taking possession of confidential information in order to damage the activities and/or negatively affect the reputation of the Branch;

4) misuse/appropriation/theft/embezzlement of the assets of the Company;

5) theft and deliberate damage of fixed assets, inventory, and stocks of the Company.

5.2. The following shall be considered as corruption offenses:

5.2.1. intentional acts committed when giving or receiving a bribe;

5.2.2. commercial bribery or other illegal use by member of the Board of Directors and an Employee of the Branch of his/her official position contrary to the legitimate interests of the Company and its shareholders in order to obtain benefits in the form of money, valuables, gifts and other property or services of property, physical or moral nature;

5.2.3. obtaining other property rights for oneself or for third parties or unlawful provision of such benefit to the specified person by other individuals;

5.2.4. receiving other property benefits and advantages in accordance with the Corruption Law of the Netherlands and the Republic of Kazakhstan;

5.2.5. provision of illegal material remuneration, gifts, benefits or services by individuals and legal entities to persons authorized to perform public functions or persons equated to them;

5.2.6. receipt of illegal material remuneration, gifts, benefits or services by a person authorized to perform public functions or a person equated to such a person (management personnel of the Branch, which includes the General Director, Deputy General Directors performing administrative and economic functions permanently, temporarily or by special authority) personally or through an intermediary for actions (inaction) in favor of the persons who provided them, if such actions (inaction) fall within the official powers of the person authorized to perform public functions.

5.2.7. other unlawful guilty act (action or inaction) having signs of corruption, for which the laws of the Netherlands and the Republic of Kazakhstan establish administrative or criminal liability.

6. Procedures for Dealing with Fraud and Corruption Offenses


6.1. In order to prevent or detect fraudulent and corrupt practices, the Compliance Officer shall conduct the following activities:

1) initiates an internal investigation/verification of the information received in the Company;

2) checks the write-off, utilization, storage of property, if necessary;

3) has the right to conduct inspections of balances and surpluses of inventory and stock, as well as fixed assets and other property;

4) conduct any actions for the purpose of prevention, assistance in suppression,

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detection, and investigation of acts of fraudulent and corrupt nature.

6.2. The Business Support Department of the Branch, which carries out procurement, shall, on a mandatory basis, together with the Compliance Officer, check potential Counterparties for pseudo-entrepreneurship, reliability, tax and other debts through the official websites of authorized bodies (Ministry of Finance of the Republic of Kazakhstan, JSC Samruk-Kazyna, JSC NC KazMunayGas and others) or by sending requests.

6.3. Employees of the Company have the right to inform the Compliance Officer about their suspicions or provide information received from other persons about possible fraudulent and corrupt practices committed by any officer or employee, supplier or other natural or legal persons having any relation to the Branch.

6.4. Any person who has reasonable cause to believe that an unlawful act has been committed should not attempt to investigate on his or her own, discuss information received with others, etc.

6.5. The Compliance Officer guarantees the confidentiality of information about all Employees, as well as other persons, contractors, and counterparties who have reported violations in good faith.

6.6. The Company reserves the right to refrain from conducting a check or official investigation of anonymous reports of fraud or corruption.

6.7. The appeals specified in clause 6.6. of this Policy shall not be considered by the Company, as the information received may be unreliable and in most cases fictitious in order to defame someone's name or activities.

6.8. In order to clarify the circumstances, the Compliance Officer alone or jointly with the employees concerned of the Company may set up a Commission to conduct an internal investigation/verification of possible fraudulent or corrupt practices within a reasonable period of time.


6.9. The Compliance Officer or members of the Commission shall have free and unimpeded access to all documents of the Company within the framework of an official investigation. Also, the Compliance Officer or members of the Commission shall have the right, within the area of investigation, to inspect, take photographs, videotape, and copy, in whole or in part, official documents kept in folders, desks or other storage areas at the Branch's facilities, including those of a confidential nature.

6.10. Employees of the Company who conducted an official investigation are obliged to respect the confidentiality of the information obtained and protect the reputation of all related parties by granting access to information related to the allegations and investigation only to persons who have a legal right to such access.

6.11. In case of identification of possible facts of fraudulent and corrupt nature on the part of the Employees of the Company, the completion of the investigation is considered to be the adoption of corrective measures, based on the Zero Tolerance Principle to any manifestations of corruption, up to termination of employment and transfer of materials to the relevant authorized state authorities, as well as improvement of control procedures. The decision on forwarding the results of the investigation to the relevant law enforcement authorities shall be made by the General Director of the Branch.

6.12. The Company shall have the right to provide law enforcement and judicial authorities with available materials collected during the course of an official investigation/inspection.

6.13. In all cases where the evidence is sufficient to bring individuals to disciplinary

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responsibility, this will be done in compliance with the current laws of the Republic of Kazakhstan.

6.14. Members of the Board of Directors and Employees of the Company, in case of any facts of inducement by member of the Board of Directors and an Employee of the Company, as well as by a third party committing a corruption offense and/or possessing information on known facts or suspicions of inducement of members of the Board of Directors and an Employee of the Company to commit a corruption offense, shall immediately notify the Compliance Officer.

7. Accounting and Audit

7.1. In order to provide stakeholders with complete and reliable information on the financial position, results of operations and changes in financial position, the Company maintains accounting, tax, and management records in full compliance with the requirements of applicable laws, international financial reporting standards, and internal regulatory documents of the Company.

7.2. All financial and economic transactions are recorded in accounting and other types of records, taking into account the principles of completeness, accuracy and openness, reliability, comparability, relevance, and clarity.

The Company shall not allow business transactions without their reflection in the accounting records, distortion or falsification of accounting, management, tax, and other records or supporting documents.

7.3. All business transactions of the Company shall be duly reviewed and approved by authorized Employees in accordance with the requirements of internal documents.

7.4. Accounting and reporting are subject to regular external audits in accordance with legal requirements and internal documents of the Company, as well as periodic internal audits.

8. Analysis and assessment of corruption risks

8.1. In accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents, the Company conducts internal analysis and assessment of corruption risks.


The purpose of corruption risk analysis and assessment is to identify the causes of corruption risks and develop measures to eliminate or minimize them. Corruption risks are identified through anti-corruption monitoring and internal audit of the anti-bribery management system.

8.2. The Company conducts thematic anti-corruption monitoring in accordance with the legislation of the Republic of Kazakhstan and its internal regulatory documents.

The subject of thematic anti-corruption monitoring is information related to the effectiveness of the anti-corruption policy, the state of law enforcement practice in the area of combating corruption, as well as the perception and assessment of the level of corruption in the Company.

8.3. The Company annually forms a register of corruption risks by identifying and assessing corruption risks based on an internal order on anti-corruption monitoring and internal analysis of corruption risks.

8.4. The Corruption Risk Register is a part of the Company's general risk register (Risk

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Map), implemented within the framework of the Regulations on organization of the process of risk management of the Company, approved by the order of the General Director of the Branch dated June 23, 2017, No.1-2022-0185, where the implementation of the Action Plan for the management of production and non-production risks of the Company is monitored on a quarterly basis.

8.5. The effectiveness of the existing anti-corruption system is also periodically analyzed based on the results of independent audits by external consultants (auditors).

9. Verification of Counterparties and candidates for vacant positions of CEO, CEO-1, CEO-2

9.1. The Company shall make reasonable efforts to minimize the risk of doing business with Counterparties that may be involved in corrupt activities by assessing Counterparties' tolerance for bribery, including, where appropriate, whether they have their own anti-corruption policies or procedures, their willingness to comply with the requirements of this Policy and to include clauses in contracts, and to provide mutual assistance to conduct business ethically and prevent corruption.

9.2. The use of an anti-corruption clause helps to maintain trust between the parties and prevent corruption, both in the conclusion and execution of contracts.

9.3. When intending to establish business relations with counterparties, the initiator of the contract and/or other agreement together with the Compliance Officer, should conduct a review of the presence of "risk factors", a list of which is provided in Annex No.3 to this Policy.

9.4. In case of identification of "risk factors", the initiator of the contract and/or other agreement together with the Compliance Officer shall be obliged to inform the supervising Deputy Head of the Branch and/or the General Director of the Branch in order to make an appropriate decision.

9.5. Before making a decision to start or continue business relations, when engaging candidates for vacant positions of CEO, CEO-1, CEO-2 or before extending employment relations with them, when interacting with Counterparties and other stakeholders, the Company checks their reliability, absence of Conflict of Interest, relationship with Politically Exposed Persons, analyzes available information on reputation.


9.6. The procedure for verification of candidates for vacant positions of CEO, CEO-1, CEO-2 or for renewal of labor relations with them for compliance with the requirements established, including this Policy, is conducted in accordance with the Company's internal documents.

9.7. The procedure and criteria for checking Counterparties and recipients of charitable/sponsorship assistance are set out in the Company's internal documents.

10. Prosecution for Acts of Corruption

10.1. The Company shall make all possible reasonable and lawful efforts to bring to responsibility promptly and inevitably for corrupt practices and other violations of the requirements of anti-corruption laws and internal documents in the area of combating corruption, regardless of the size and form of such violations.

10.2. The Company reserves the right to make public, in accordance with the established procedure, information about persons held liable for committing corruption

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offenses established by this Policy.

10.3. The Company adheres to a zero-tolerance policy towards committing or concealing fraudulent, corrupt, and other illegal acts. It is the responsibility of each Employee, regardless of the status and position, to comply with the requirements of this Policy.

10.4. Allegations of such actions will be investigated and pursued to their logical conclusion, including, where appropriate, legal action, initiation of disciplinary, including termination of contract, administrative or criminal liability.

10.5. When conducting investigations, the length of service, position of the audited persons, and their relations with the Company shall not be taken into account.

10.6. The Company guarantees that all the members of the Board of Directors and the Employees of the Company who refused to commit a corruption offense, even if, as a result of such refusal, the Company did not receive additional material and non-material benefits, incurred losses, avoidance of which was possible only by violating the requirements of the laws or this Policy, will not be subject to disciplinary liability.

10.7. In case of harm and damage to the Company, the Company reserves the right to file a civil lawsuit against the person who committed corruption offenses and/or fraudulent actions.

10.8. The Company considers corruption offenses and/or fraudulent acts to be unacceptable and strives to promptly identify and prevent retaliation against Employees of the Company who, in good faith, report a suspected corruption offense committed by another Employee of the Company, even if such suspicion is not confirmed.

10.9. The General Director of the Company's Branch shall bear disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan for non-performance or improper performance of official duties to prevent the commission of corruption offenses by subordinate employees;

10.10. The General Director of the Company's Branch shall be subject to disciplinary liability for the commission of corruption offenses by employees directly subordinate to him/her under the following cumulative conditions:

1) A connection has been established between the corruption offence committed by a subordinate and the guilt of failure to perform or improper performance of official duties to prevent the commission of corruption offences;

2) A judicial act which has taken legal effect against a subordinate employee on bringing him/her to criminal liability for a corruption offence or criminal proceedings for committing a corruption offence have been terminated by a criminal prosecution body or a court on the basis of Article 35.1(3, 4, 9, 10, 11, 12) or Article 36 of the Criminal Procedure Code of the Republic of Kazakhstan.


11. Measures to counteract and prevent corruption and fraudulent offenses

11.1. In order to form an appropriate level of corporate culture, newly hired Employees are given introductory training on the provisions of this Policy and related documents

11.2. Prevention of corruption and fraudulent offenses in the Company is conducted by applying the following key measures on an ongoing basis:

11.2.1. formation of intolerance to fraudulent actions, embezzlement of property and corrupt behavior among the Employees of the Company by:

a) holding explanatory talks by the management of the Company with the employees of

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the supervised subdivisions;

b) communication of the facts revealed in the Company and court decisions, if any, by the management to the Employees of the Company;

c) holding annual training seminars and trainings for the Company's Employees to explain the norms of anti-corruption legislation of the Republic of Kazakhstan and with this Policy publicly available on the Branch's website and internal resources.

11.2.2. introduction into the practice of personnel work of the rule, according to which long, faultless, and effective performance by an Employee of his/her official duties shall be taken into account when appointing him/her to a higher position or when rewarding him/her;

11.2.3. ensuring the right of Employees of the Company, as well as third parties to report known facts or suspicions of fraud, corruption offenses, embezzlement, abuse, and other illegal actions by any methods not contrary to the laws of the Republic of Kazakhstan.

12. Hotline

12.1. In order to maintain a high level of trust in the Company, compliance with international standards of ethical business conduct, as well as to prevent and suppress cases of fraud and corruption, the Branch operates a Hotline.

12.2. By contacting the Hotline, any person may, in a convenient form, including on the condition of anonymity, report facts of embezzlement and misappropriation in the Company, fraud, bribery, commercial bribery, Conflict of Interest, other manifestations of corruption and violations of the provisions of the Policy.

12.3. Each appeal is carefully reviewed, the results of the review of the appeal are brought to the attention of the responsible persons of the Company, and if there are grounds, an appropriate inspection is conducted in accordance with the internal documents and procedures of the Company. The contacts of the Hotline shall be placed on the official website of the Company on the Internet, on information stands and in other publicly accessible places. Provision of information is available 24 hours a day, without weekends and holidays, except for occasional website malfunctions.

13. Interaction with Third Party

13.1. The Company shall cooperate on the basis of the principle of reciprocity in the area of combating fraud and corruption with authorized state bodies and organizations, partners, and customers in order to:

13.1.1. identify persons suspected (accused) of committing fraudulent, corrupt acts and/or embezzlement, their whereabouts, as well as the whereabouts of other persons involved in such acts;


13.1.2. identify and transfer back or in favor of the state the property obtained as a result of fraudulent, corrupt actions and (or) embezzlement

13.1.3. share information and data on anti-fraud and anti-corruption issues;

13.1.4. coordinate activities and develop joint measures to prevent and combat fraud and corruption.

13.2. The Company undertakes to report corruption offenses of which the Company becomes aware to the appropriate law enforcement authorities.

13.3. Employees may interact with law enforcement agencies in the following ways:

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13.3.1. informing law enforcement agencies about cases of violations that have signs of corruption and fraud;

13.3.2. providing assistance to law enforcement agencies in conducting measures to suppress or investigate corruption;

13.3.3. providing responses / participation in discussions (meetings) at the request of law enforcement agencies on the issues of preventing and combating corruption.

14. Anti-Corruption Restrictions and Declaration of Income and Property

14.1. In order to prevent persons equated to persons authorized to perform state functions, as well as persons who are candidates for these positions from committing actions that may lead to the use of their powers in personal, group and other non-business interests, these persons shall assume anti-corruption restrictions established by the current legislation of the Netherlands and the Republic of Kazakhstan on combating corruption:

14.1.1. inadmissibility of joint service (work) of Close relatives, spouses, and In-law relatives;

14.1.2. use of official and other information not subject to official dissemination in order to obtain or derive property and non-property benefits and advantages;

14.1.3. acceptance of gifts in connection with fulfillment of official duties in accordance with the laws of the Netherlands and the Republic of Kazakhstan.

14.2. The consent of these persons to the adoption of anti-corruption restrictions shall be recorded by the Compliance Officer in writing.


Failure to comply with anti-corruption restrictions by the above-mentioned persons entails refusal to accept them for a position or dismissal from a position (termination of appointment), and failure to comply with them in cases where there are no signs of a criminally punishable act, or an administrative offense is grounds for termination of their respective activities.

14.3. Persons who are candidates for a position related to the performance of public or equivalent functions, as well as their spouses, and other Employees of the Company, who are obliged by the laws of the Republic of Kazakhstan to submit relevant tax reports or forms, shall submit a declaration of assets and liabilities, income and property or other tax reports or forms to the state revenue authority at their place of residence in accordance with the legislation of the Republic of Kazakhstan, as well as a certificate/notification or other document, confirming the submission of reports to the Compliance Officer and the Human Resources Management Department of the Branch.

14.4. Failure to submit or submission of incomplete, inaccurate declarations and information, if the deed does not contain signs of a criminal offense, shall be grounds for refusal to authorize a person with relevant powers or shall entail disciplinary or other liability in accordance with the procedure provided for by the Laws.

15. Final Provisions

15.1. In order to comply with international standards of business ethics, openness and transparency of business conduct, Employees shall notify the Compliance Officer of all cases of their inducement to commit corruption offenses, in accordance with the internal documents of the Company.

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15.2. In case of doubts regarding the legality of actions of other Employees or counterparties, possible corrupt practices and other violations, including embezzlement, fraud, bribery, commercial bribery, conflict of interest and other, an Employee of the Company, Counterparty or other person may report their doubts to the Compliance Service of JSC “Samruk-Kazyna” and/or JSC NC “KazMunayGas” in the form of an open dialog (including anonymously) or contact the Hotline in accordance with the procedure established by the internal documents of the Company.


15.3. If the Laws are amended and the provisions of this Policy come into conflict with the Laws, such provisions of the Policy shall not apply, and the provisions of the Laws that take precedence over the provisions of this Policy shall apply.

16. Regulatory references

Item No.	Document Title
1	Law of the Republic of Kazakhstan “On Combating Corruption” dated 18.11.2015, No. 410-V ZRK
2	The Criminal Procedure Code of the Republic of Kazakhstan
3	Corporate standard for compliance functions of the group of JSC NWF “Samruk-Kazyna”
4	Counterparty Due Diligence Policy of PCLL “KMG Kashagan B.V.”
5	Regulations on Proactive Reporting in the Branch of PCLL “KMG Kashagan B.V.” in the RoK
6	Regulations on Conducting an Official Investigation in the Branch of PCLL “KMG Kashagan B.V.” in the RoK
7	International standard ISO 37001 “Anti-corruption management Systems”

17. Documents and Records

Item No.	Document Record Title	Document Record Identification Number
1	Undertaking to comply with the provisions of the Anti-Corruption and Fraud Policy in the Branch of PCLL “KMG Kashagan B.V.”	KBV-F-1.1-20/ PR-18.1-20
2	Memo of the Employee of PCLL “KMG Kashagan B.V.” on compliance with the requirements of Anti-Corruption Law	KBV-F-2.1-20/ PR-18.1-20
3	Consent to the adoption of anti-corruption restrictions and prohibitions	KBV-F-3.1-20/ PR-18.1-20
4	Template for an anti-corruption clause	KBV-F-4.1-20/ PR-18.1-20

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Annex 1.

Form of undertaking to comply with the Anti-Corruption and Fraud Policy PCLL “KMG Kashagan B.V.”
(Required)

UNDERTAKING

to comply with the provisions of the Policy on Combating Corruption and Fraud in the Branch of PCLL KMG Kashagan B.V. in the Republic of Kazakhstan

1. Member of the Board of Directors/an Employee confirms that he/she has familiarized himself/herself with the contents of the Anti-Corruption and Fraud Policy of PCLL “KMG Kashagan B.V.” and the Code of Business Ethics of PCLL “KMG Kashagan B.V.” and undertakes to comply with them.

2. Member of the Board of Directors/an Employee shall:

2.1. Refrain from engaging in corrupt practices directly or indirectly, personally or through Third Party Intermediaries, including offering, giving, promising, requesting or receiving Bribes and facilitation payments in any form (Incentive Payments), including in the form of cash, value, services or other benefits, to and from any person or organization, including commercial organizations, government and self-governing bodies, Kazakhstan and foreign government officials, private companies and their representatives.

2.2. Refrain from behavior that could be interpreted by others as a willingness to commit or participate in the commission of a corruption offense for or on behalf of the Company.

2.3. Immediately inform the immediate supervisor and the person responsible for monitoring compliance with the Policy on:

- cases of inducement of Member of the Board of Directors/ an Employee committing corruption offenses;

- information that has become known to the Member of the Board of Directors/ an Employee about cases of corruption offenses committed by other Employees, the Company's Counterparties, or other persons;


- the possibility of a Conflict of Interest that may arise or has arisen for a Member of the Board of Directors/an Employee.

3. The Employee has familiarized himself/herself with the opportunity to report to the KMGK Hotline, Compliance Officer responsible for monitoring compliance with the Policy, any suspicions about the legality or ethics of his/her actions, as well as actions, inactions or suggestions of other Members of the Board of Directors/Employees, Counterparties or other persons who interact with the Company.

4. It is made clear to the Employee that no Employee of the Company, including him/her, will be subject to sanctions or retaliation by the Company if he/she reports an alleged corruption, or if he/she refuses to give or receive a Bribe, to commit Commercial Bribery or in any other way refuses to provide Bribery Facilitation, including where such refusal results in a loss of profit or commercial and competitive advantage to the Company.


5. The Employee is warned about the possibility of disciplinary, administrative, civil, and/or criminal liability for violation of anti-corruption requirements of Kazakhstan and other applicable laws, as well as the Anti-Corruption Policy and the Code of Business Ethics of PCLL “KMG Kashagan B.V.”

6. It is explained to the Member of the Board of Directors/ an Employee that if he/she

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has additional questions about the principles and requirements of the Policy to Combat Corruption and Fraud in PCLL “KMG Kashagan B.V.” and applicable anti-corruption law, he/she may contact the Compliance Officer responsible for monitoring compliance with the Policy.

dated _____ 20____ / _____

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Annex 2

Form of the Memo of PCLL “KMG Kashagan B.V.” on compliance with the requirements of anti-corruption legislation (Required)

MEMO OF THE EMPLOYEE OF PCLL KMG KASHAGAN B.V. ON COMPLIANCE WITH THE REQUIREMENTS OF ANTI-CORRUPTION LAW

1. What behaviors are prohibited?

The Anti-Corruption and Fraud Policy of PCLL KMG Kashagan B.V. (hereinafter - KMGK) (hereinafter - the Policy) prohibits any form of corruption: abuse of official position, giving a bribe (Active Bribery), receiving a bribe (Passive Bribery), Intermediation, abuse of power, commercial bribery or other illegal use by an individual of his/her official position contrary to the interests of KMGK and the state, to obtain a benefit in the form of money, valuables, other property or services of a proprietary nature, other property rights for themselves or third parties, or unlawful provision of such benefit to the said person by other individuals, as well as committing the said acts on behalf of or in the interests of a legal entity.

2. What is a Bribe?

A bribe is material valuables (objects or money) or any property benefit or services accepted for an action (or, conversely, inaction), in the interests of the bribe-giver, which this person could or should have done by virtue of his/her official position.

Something of value, including a financial or other advantage, can be a bribe. Examples of bribes include (but are not limited to):

- financial payments or promises of payments in cash or cash equivalents (e.g., gift certificates),
- gifts, entertainment and tokens of hospitality (e.g., travel, meals and accommodation),
- services,
- loans and valuable collateral,
- property or any share in property of any kind,
- protection from penalties and release from any obligation,
- something provided for inappropriate remuneration,
- providing internships, work experience, or offering temporary, or permanent employment (including providing the same services/benefits to Close Relatives, spouses, In-law relatives),
- political or charitable contributions.


No evidence or argument that Bribery is a necessary measure in any local industry, business, profession or vocation and no other argument may be used in defense of Bribery.

3. Active Bribery

It is always unacceptable for KMGK Employees/Officials:

- offer, promise or pay bribes, including Incentive Payments, other illegal payments or advantages to or for the benefit of, or at the direction of, a Politically Exposed Person;
- facilitate, mediate, assist or support such behavior.

A violation of the Policy occurs if a KMGK Employee/Official offers, attempts to pay or pays, or is an intermediary in the payment of a bribe to a Politically Exposed Person, even if the KMGK Employee/Official does not receive a benefit in return.

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4. Passive Bribery

Employees/Officials of the Company are prohibited:

- to ask for, demand, agree to receive or accept a bribe from a Politically Exposed Person or another person.

This prohibition applies regardless of whether the Employee receives the bribe for his/her own benefit or on behalf of another person.

A violation of the Policy occurs if a KMGK Employee/Official requests or demands a bribe; The bribe may not actually be paid.

5. What is Commercial Bribery?

Commercial bribery is the illegal transfer to a person performing managerial functions in a commercial or other organization of money, securities or other property, as well as the illegal rendering of services of a property nature to him/her for the use of his/her official position, as well as general patronage or permissiveness in service in the interests of the person who performs the bribery.

6. When is an advantage considered a Bribe or Commercial Bribery?

Giving an advantage is a Bribe, regardless of value, if the intent is there:

- to induce or encourage improper behavior on the part of the recipient or another person (Commercial Bribery); or
- to influence a Politically Exposed Person (illegally or otherwise) in the performance of his or her official duties in order to obtain or retain a commercial advantage.


Providing an advantage is likely to be a Bribe if:

- it is illegal under the relevant anti-corruption and anti-bribery laws;
- it creates an obligation or the appearance of an obligation for the other party;
- it is intended to induce a person to act or not to act in order to confer some benefit or general support on the person conferring the advantage or on the organization of the person conferring the advantage;
- it is provided to a Politically Exposed Person to influence the official with respect to his or her official duties, to expedite the performance of official duties, or to obtain general support from such person;
- it is unreasonable in terms of cost, frequency or manner of provision.

7. What else is prohibited?

It's also unacceptable for you:

- to violate financial discipline, including criminal acts such as stealing money and making false reports, insider trading, money laundering or misappropriation of funds;
- to use or offer privately to others to access or use the resources of the Branch or the Company, including assets, funds or intellectual property, without prior written authorization from the Branch (order of the General Director) or the Company (resolution of the Company's Board of Directors);
- to attempt to induce an individual employee of a commercial organization, a state (in whole or in part) organization or a Politically Exposed Person to engage in illegal actions;
- to offer, give or authorize Bribes/Commercial Bribery, directly or indirectly, through an agent or associated person:
 - a. to Politically Exposed Person, or
 - b. to manager, officer, or employee of a business or other organization;
- to offer or provide an unauthorized benefit (whether property or otherwise) to an employee of any competitor, supplier or customer that could result in an unfair competitive

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advantage and a violation of applicable competition provisions, such as any benefit that could result in an improper advantage of the Company over its competitors;

- to use any connections, you may have with Politically Exposed Persons to unlawfully gain a competitive advantage against the Company;

- fail to report signs of illegal payments or favors under the Policy, or any circumstances that give reason to suspect such behavior, to the Compliance Officer and immediate supervisor;

- to take actions, including fraudulent false statements, that induce a party to obtain a financial or other benefit, or to evade an obligation;


- to attempt to withhold or conceal any of the above.

I have familiarized myself with the memo, everything has been read and explained in full.

Full name _____

Signature _____


Date _____

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Annex 3
Risk factors
(informational)

Risk Factors

- 1) cases of financial insolvency or bankruptcy in the past;
- 2) cases of provision of a negative audit report;
- 3) availability of information on pre-trial inspections or court proceedings on charges of bribery or other corrupt activities;
- 4) lack of qualifications, relevant experience of the potential counterparty with whom the contract is to be concluded, lack of licenses or permits required for the execution of the contract, or other factors that may prevent the potential counterparty from fulfilling the terms of the contract;
- 5) the cost of products/services is significantly higher or lower than the market price;
- 6) the draft contract with the counterparty provides for reimbursement of expenses that are not supported by necessary documents and are unreasonably high;
- 7) the draft contract with the counterparty provides for the transfer of funds for payment for products/services to accounts opened in countries other than those in which the services were rendered or in which the counterparty is registered;
- 8) the draft contract with the counterparty provides for payment for products/services in cash;
- 9) the potential counterparty is affiliated with government organizations or officials;
- 10) interaction with a potential counterparty was recommended by an official;
- 11) the potential counterparty proposes to engage intermediaries;
- 12) existence of a conflict of interest;
- 13) the counterparty refuses to provide information necessary for the evaluation procedures;
- 14) other factors.

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Annex 4

Form of consent to the adoption of anti-corruption restrictions and prohibitions (required)

Consent to acceptance of anti-corruption restrictions and prohibitions

I, (full name) _____, accept the anti-corruption restrictions and prohibitions under the Law of the Republic of Kazakhstan "On Combating Corruption" on:


- 1) inadmissibility of joint service (work) of Close relatives, spouses, and In-law relatives;
- 2) conducting activities incompatible with the performance of official duties in KMGK and KMG and its subsidiaries and affiliates;
- 3) use of official and other information not subject to official dissemination in order to obtain or derive property and non-property benefits and advantages;
- 4) accepting material remuneration, gifts, or services for actions (omissions) for the benefit of the persons who provided them, if such actions fall within my official authority or if I, by virtue of my official position, may contribute to such actions (omissions).
- 5) participation in gambling and/or betting in gambling establishments that fall under the definition provided by the Law of the Republic of Kazakhstan "On Gambling", as well as participation in gambling and/or betting in unauthorized places or in gambling and/or betting conducted through the use of telecommunication networks, including the Internet;
- 6) inadmissibility of independent participation in management of a business entity, if management or participation in management of a business entity is not included in job duties in accordance with the legislation of the Republic of Kazakhstan, promotion of satisfaction of material interests of organizations or individuals through misuse of their official powers in order to obtain property or other benefits;
- 7) refrain from engaging in other paid activities, except for pedagogical, scientific, and other creative activities.

I am aware of the responsibility established by the current legislation of the Republic of Kazakhstan for failure to comply with the restrictions and prohibitions established by the legislation of the Republic of Kazakhstan on combating corruption.

Full name _____

Signature _____

Date _____

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Annex 5

Anti-corruption clause template for contracts with counterparties
(recommended)

Anti-corruption clause for contracts with counterparties

1. In fulfilling their obligations under the Agreement, the Parties and their employees shall not pay, offer to pay, or authorize the payment of any funds or valuables, directly or indirectly, to any persons, in order to influence the actions or decisions of these persons in order to obtain any unlawful advantages or other unlawful purposes.

2. In fulfilling their obligations under the Agreement, the Parties and their employees shall not carry out actions qualified by the legislation applicable for the purposes of the Agreement, such as giving/receiving bribes, commercial bribery, as well as actions that violate the requirements of applicable legislation and international acts on countering the legalization (laundering) of proceeds from crime.

3. Each Party declares and guarantees to the other Party that, prior to the signing of this Agreement, it has not bribed or attempted to bribe the other Party in order to establish and/or extend any business relationship with the other Party in connection with this Agreement.

4. Each Party acknowledges and agrees that it has become familiar with the laws against bribery and money laundering of all countries in which it is established or registered and in which it operates, and will comply with these laws.


5. Each of the Parties to the Agreement refuses to stimulate the employees of the other Party in any way, including by providing sums of money, gifts, gratuitous performance of works (services) to them and in other ways that place the employee in a certain dependence, and aimed at ensuring that this employee performs any actions in favor of stimulating his Side.

6. If a Party suspects that any anti-corruption conditions have been violated or may be violated, the relevant Party undertakes to notify the other Party in writing.

7. In a written notification, the Party is obliged to refer to facts or provide materials that reliably confirm or give reason to believe that there has been or may be a violation of any provisions of these terms by the counterparty or its employees, expressed in actions qualified by applicable law as giving or receiving bribes, commercial bribery, as well as actions that violate requirements of applicable legislation and international acts on countering the legalization of proceeds from crime.

8. The Parties to the Agreement recognize the implementation of procedures to prevent corruption and monitor their compliance. At the same time, the Parties make reasonable efforts to eliminate the risk of business relations with counterparties who may be involved in corrupt activities, and also provide mutual assistance to each other in order to prevent corruption. The Parties undertake to ensure the implementation of procedures for conducting inspections and interviews of their owners, directors, officials and other Affiliated Persons in order to prevent the risks of involvement of the Parties in corrupt activities.

9. The Parties agree that in addition to the rights to terminate (refuse to perform) provided for in other provisions of this Agreement, the non-violating Party has the right to immediately terminate (refuse to perform) this Agreement in the event of a violation by the other Party of these anti-bribery and corruption provisions, and the other Party has no right to demand any additional payments under this Agreement, except for payments not related to violations of these anti-bribery and corruption regulations, for goods (works, services), properly

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delivered (performed, rendered) under this Agreement prior to its termination.

10. Each Party shall be released from obligations to make any payment that may be due to the other Party under this Agreement if such payment is related to the violation by the other party of these anti-bribery and corruption regulations.

11. [Name of the Contractual Counterparty] undertakes to ensure that all individuals and legal entities affiliated with it operating under this agreement (hereinafter each of them is referred to as an "Affiliated Person"), including, without limitation, owners, directors, officers, employees and agents of [Name of the Contractual counterparty], comply with the guarantees of this reservations.

12. [Name of the counterparty to the agreement] and its Affiliates have not been convicted of or found guilty of any illegal activities related to fraud or corruption. [Name of the counterparty under the agreement] undertakes to immediately inform KMGK in writing if [Name of the counterparty under the agreement] or any of its Affiliates are convicted of committing or found guilty of committing such illegal acts.

13. [The name of the counterparty under the agreement] confirms that he has read the KMGK Code of Business Ethics and the KMGK Anti-Corruption and Fraud Policy on the official KMGK website. [The name of the counterparty under the agreement] certifies that he fully understands the KMGK Code of Business Ethics and the KMGK Anti-Corruption and Fraud Policy.

14. [Name of the counterparty under the agreement] undertakes to promptly notify KMGK of all cases of violations of the requirements of the anti-corruption clause related to the activities of KMGK. To report cases of violations of the requirements, [the name of the counterparty under the agreement] is obliged to use the KMGK Hotline, information about which is posted on the official website of KMGK.