

**Extract from the minutes of the in-person meeting
of the Supervisory Board of Tau-Ken Altyn LLP No. 4-2026**

Astana

March 27, 2026

Location of Tau-Ken Altyn LLP: Astana, 194 A street, building 1

Venue of the meeting: Astana, A194 str., building 1

The meeting is open at 3 p.m.

Chaired:

Idrisov Daniyar Yerlanovich - Chairman of the Supervisory Board

The members of the Supervisory Board were present:

Zeynullin Abdikarim Abzhalelovich - Independent Director

Bergenev Adylgazy Sadvakasovich - Independent Director

Members of the Supervisory Board were absent:

Ablazimov Rakhmattula Mahsudkhanovich - Member of the Supervisory Board

There is a quorum for holding a meeting of the Supervisory Board.

Having considered the fifth item on the agenda "On the approval of the Policy of Proactive Information of Tau-Ken Altyn LLP", the Chairman of the Supervisory Board put this issue to the vote.

In accordance with subparagraph 17) of paragraph 46 of the Charter of Tau-Ken Altyn LLP, subparagraph 4) of paragraph 15 of the Regulation on the Compliance Officer of Tau-Ken Altyn LLP, the Supervisory Board of Tau-Ken Altyn LLP, **DECIDED:**

1. To approve the Policy of Proactive Information in accordance with Appendix No. 3 to the minutes.
2. To invalidate the Policy of Proactive Information, approved by the decision of the Supervisory Board No. 63 dated 11.10.2022.
3. The Compliance officer of Tau-Ken Altyn LLP (T.K. Shiabiden) should take all necessary measures arising from this decision.
4. This decision comes into force from the moment of signing.

The members of the Supervisory Board voted:

Idrisov Daniyar Yerlanovich – "FOR"

Zeynullin Abdikarim Abzhalelovich – "FOR"

Bergenev Adylgazy Sadvakasovich – "FOR"

The meeting of the Supervisory Board is closed at 4 p.m.

The statement is correct

**Secretary of the Supervisory Board of
Tau-Ken Altyn LLP**

R. Nabiyev

Signed in MetaDoc

Link verification: [\[Verification link \]](#)



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Appendix No. 3 to the minutes of the meeting of the
Supervisory Board of Tau-Ken Altyn LLP dated March 27, 2026 (Minutes No. 4-2026)

Policy of Proactive Information of Tau-Ken Altyn LLP

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1 Purpose

1.1 This Policy of Proactive Information (hereinafter referred to as the Policy) defines the procedure for reporting violations, reviewing them, taking measures based on the results of their review, and also establishes measures to support employees of Tau-Ken Altyn LLP (hereinafter – the Partnership), as well as other interested parties when they submit reports of violations to the Partnership.

1.2 This Policy does not apply when considering appeals from individuals and legal entities in accordance with the Administrative Procedural Code of the Republic of Kazakhstan.

2 Sphere of application

The provisions of this Policy apply to all employees of the Partnership, including employees engaged under outstaffing or paid service contracts.

3 Terms, definitions and abbreviations

3.1 The following terms and definitions are used in this Policy.

3.1.1 **Hotline** – a system of information channels administered by the Operator, designed to receive reports of violations, provide feedback to the authors of messages and ensure anonymity, confidentiality and round-the-clock availability.

3.1.2 **Disciplinary punishment** – a measure of disciplinary action against an employee applied by the employer in cases stipulated by the laws of the Republic of Kazakhstan for committing a disciplinary offense.

3.1.3 **Interested party** – a member of the Supervisory Board of the Partnership, consultants, contractors, suppliers and their employees, representatives and subcontractors, as well as other persons providing services for the Partnership or acting on their behalf, other third-party organizations, as well as individuals.

3.1.4 **Initiator of the message** – an Employee or an Interested Person.

3.1.5 **Information System Hotline** – a single compliance function information system designed to register and process incoming messages and provide feedback to the Message Initiator.

3.1.6 **Operator** – an external independent organization that receives Reports on potential, committed or ongoing violations of Anti-Corruption legislation, regulatory requirements, as well as on other issues stipulated by this Policy.

3.1.7 **Harassment** – any negative actions against the Initiator of the message and other persons involved, including, but not limited to: demotion, reduction of wages, deterioration of working conditions, social isolation, threats.

3.1.8 **An employee** – an individual who is in an employment relationship with a Partnership and directly performs work under an employment contract, as well as outstaffing employees.

3.1.9 **Proactive information system** – a set of procedures, communication channels and organizational measures that enable Employees and Stakeholders to report violations, including internal information channels and a Hotline.

3.1.10 **Internal investigation** – the activity of verifying information and collecting materials, conducting a timely, comprehensive, complete and objective investigation of the circumstances of a possible Employee's commission of an offense or disciplinary offense, as well as identifying the causes and conditions that contributed to their commission, and identifying those involved.

3.1.11 **Message** - information received through the designated communication channels specified in Section 6 of this Policy, as well as by other means provided for in this Policy.

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3.1.12 **Subject** - an employee or an official of the Partnership in respect of whom a Notification has been submitted.

3.2 The following abbreviations are used in this Policy:

Partnership - Tau-Ken Altyn LLP

Company - Tau-Ken Samruk NMC JSC

Fund - Samruk-Kazyna JSC

4 General provisions

4.1 This Policy has been developed in accordance with the legislation of the Republic of Kazakhstan, the Corporate Standard for the Compliance Function of the Samruk-Kazyna JSC Group, internal documents of the Partnership and the requirements of ST RK ISO 37001-2017 “Anti-bribery Management Systems”.

4.2 The Policy is an integral part of the Partnership's compliance risk management system and is integrated with other policies, rules and procedures in the field of compliance and anti-corruption.

4.3 The Partnership strives for the best standards of corporate governance, transparency and accountability and, therefore, wishes to ensure compliance with applicable regulatory requirements.

4.4 Any violation, in particular, non-compliance with the Partnership's Business Ethics Code, may cause significant damage to the Partnership's activities and reputation. This Policy is intended to manage risks in relation to violations of principles and standards of conduct, as well as to comply with the requirements of applicable anti-corruption legislation.

4.5 This Policy provides guidance for Employees and Interested Parties on the procedure for informing about committed, ongoing or potential violations in the Partnership.

4.6 The types of violations to be registered in the Hotline Information System, which are considered in accordance with this Policy, are listed in Appendix 1 to this Policy.

5 Principles of Proactive Information

5.1 The Partnership adheres to the following principles:

5.1.1 **Zero tolerance for Harassment:** The Partnership categorically does not allow any form of Harassment, discrimination or negative consequences for persons who report violations in good faith.

5.1.2 **Possibility of confidential or anonymous communication:** The Partnership guarantees the confidentiality of all Messages and provides the possibility of anonymous communication by involving an Operator.

5.1.3 **Objective and independent review:** Every Communication will be reviewed thoroughly, fairly and in a timely manner.

5.1.4 **Corrective actions:** The Partnership undertakes to take effective measures to eliminate the identified violations and prevent their recurrence.

5.1.5 **Continuous improvement:** The Partnership continuously improves procedures in accordance with the best international practices.

5.2 At the same time, Employees who act in bad faith or make accusations for personal gain and/or with malicious intent may be subject to liability measures provided for by applicable law and internal documents of the Partnership.

6 Information procedure

6.1 Employees and Interested Parties, if they become aware of non-compliance with anti-corruption legislation, regulatory requirements and/or internal procedures, should inform them as soon as possible in accordance with the procedure provided for in this Policy.

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At the same time, Employees and Stakeholders must ensure that the information disclosed is reliable and that such disclosure is in good faith. At the same time, an Employee or an Interested Party is not required to conduct any Internal Investigation into cases of non-compliance with anti-corruption legislation, regulatory requirements and/or internal procedures.

6.2 Employees and Interested Parties may, at their discretion, communicate their concerns about a potential violation, including on a confidential basis.

6.3 In order to comply with anti-corruption legislation, regulatory requirements and/or internal procedures, the Partnership provides Employees and Interested Parties with the opportunity to report violations to a Hotline operated by the Operator on the basis of confidentiality, as well as on the basis of anonymity if the applicant wishes to remain anonymous.

6.4 The current contact details of the Hotline are posted on the Partnership's corporate website in the compliance section ([https://taukenaltyn.kz/ru/compliance /](https://taukenaltyn.kz/ru/compliance/)), as well as on information stands at the factory.

6.5 The refusal of the Message Initiator to disclose his contact details to the Operator is not a reason for rejecting the Message.

6.6 In case of anonymous communication, the Partnership does not receive information about the Initiator of the message. Only the Operator has the right to request or clarify additional information. The Compliance Officer and other Employees (including members of the commission or other Internal investigation body) are prohibited from contacting the Initiator of the message, even if they have become aware of the identity of the Initiator of the message or his contact information. All interactions take place through the Information System of the Hotline, through which the compliance officer receives a Message, performs the necessary checks and uploads a response about the results of the check, which the author can view anonymously using a unique Message number.

6.7 Employees may also contact:

6.7.1 Their immediate supervisor in person or in writing. In writing, it is preferable to state the background and chronology of the issue of concern and indicate the reasons for such concern.;

6.7.2 To a higher-level supervisor - if the issue under consideration is related to the immediate supervisor or the Employee prefers not to discuss this issue with him. It is preferable to state the issue and the reasons for concern clearly in writing;

6.7.3 To the Company's Ombudsman - if the issue concerns discrimination, labor conflicts, sexual harassment, or unethical behavior. The appeal may be in oral or written form;

6.7.4 To the compliance officer - on any issues of violations anti-corruption legislation, regulatory requirements and/or internal procedures. Also, when other channels do not allow solving the problem or the Employee prefers not to discuss the issue with the management.

6.8 Due to the fact that the Compliance officer is the supervisor of the Initiative Information System, the persons specified in subclauses 6.7.1-6.7.3 of clause 6.7 are required to notify the compliance officer of the received Messages within 1 (one) business day to ensure centralized accounting and coordination. The Compliance Officer registers such Messages in the Information System of the Hotline within 1 (one) business day from the moment of their receipt. The response to the Initiator of the message is provided by the recipient of the message with mandatory notification to the compliance officer.

6.9 The responsibilities of Message recipients include:

- to receive Reports of possible violations;
- to consider each Message properly;
- to ensure that Employees are aware of this Policy;
- to encourage an open work environment to express concerns;

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- to provide recommendations to the Initiator of the message or deal with the issue personally;
- to initiate an internal investigation in accordance with the internal documents of the Partnership;
- If a decision is not possible, to forward the Message to the compliance officer;
- to ensure anonymity and Guarantees against Harassment of the Message Initiator.

7 Guarantees against Harassment and protection of applicants

7.1 The Partnership categorically does not allow any form of Harassment, discrimination or negative consequences against persons who report violations in good faith in accordance with this Policy.

7.2 Harassment means any direct or indirect negative actions, including, but not limited to: dismissal, demotion, deterioration of working conditions, reduction of wages, deprivation of bonuses and bonuses, threats, intimidation, social isolation, unreasonable criticism of work.

7.3 Guarantees against Harassment apply to Initiators of reports, witnesses who provided information during an Internal Investigation, members of the Internal Investigation Commission, as well as persons who assisted in conducting an Internal Investigation.

7.4 In order to prevent Harassment, the Employees of the Partnership involved in checking the Appeal ensure the confidentiality of the identity of the Initiator of the message and limit the circle of persons who have access to information about the Internal Investigation to the “need to know” principle.

7.5 If Harassment occurs, the Initiator of the message must immediately notify the compliance officer or contact the Hotline. The Compliance Officer is obliged to take emergency measures to stop Harassment and conduct an Internal Investigation within the time limits set by the internal documents of the Partnership. Information about the existence of Harassment against the Initiator of the message and other protected persons should be brought to the attention of the executive body and the management body of the Partnership.

7.6 Upon confirmation of the facts of Harassment, the persons guilty of Harassment are subject to liability measures provided for by applicable law and internal documents of the Partnership.

7.7 The same time, the Partnership protects Employees from deliberately false accusations. Employees who act in bad faith or make accusations for personal gain and/or with malicious intent may be subject to liability measures provided for by applicable law and internal documents of the Partnership.

8 Procedure for reviewing Messages

8.1 In case of receipt of Messages containing information about a threat to life, health, an accident, significant damage or other urgent situations, the Initiator of the message is strongly recommended to contact directly his immediate supervisor, higher management or authorized government agencies. If the message was addressed to the Partnership, the Compliance Officer is required to initiate an immediate response within one business day with the participation of the Partnership's interested units.

8.2 Messages concerning the issues of procurement of goods, works, and services by the Partnership, challenging the actions and decisions of the customer, supplier, intermediary, organizer, tender commission, expert commission, and operator of the electronic procurement information system of the Fund's group companies are not considered in accordance with this Policy, which the Initiator of the message is informed about when contacting him. If such messages were received by the Operator and registered in the Information System of the Hotline, or were mistakenly put into operation, then no later than 3 (three) business days from the date of their receipt / receipt, the Initiator of the message, if the Message is not anonymous, will be notified by the Compliance Officer about the need to contact the web portal regarding these issues. Procurement zakup.sk .kz in accordance with the legislation and procurement rules of the Fund Group.

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A corresponding note about this is made in the "Reply to the applicant" tab for accounting purposes. If, according to the results of the audit of the authorized procurement body of the Fund, violations of procurement procedures in the Partnership have been identified, the causes and conditions of the violations may be considered within the framework of the Initiative Information System.

8.3 Messages received by the Hotline are registered by the Operator within 1 (one) business day and transmitted to the Partnership in the Hotline Information System. The Hotline information system provides registration of Messages indicating the number, date of receipt, Initiator of the Message (if any), Subject, brief information about the violation and the current status. The response to the Initiator of the message is also provided in the Information System of the Hotline.

8.4 Messages directly related to the activities of the Compliance Service are sent by the Operator to the Compliance Fund Service for review.

8.5 Messages are reviewed by the Compliance Officer as they are received. The Compliance Officer conducts the initial processing of the received Message to determine the type of violation in accordance with Appendix 1 to this Policy and to decide on the need for an Internal Investigation. Based on the content of the message, the level of risk and a preliminary assessment of reliability, the Compliance Officer, within three (3) business days, decides on further consideration in one of the areas.:

8.5.1 Referral for preliminary inspection to the responsible structural units of the Partnership in accordance with Appendix 1 to this Policy. A preliminary check is carried out within a period not exceeding 10 (ten) business days from the date of receipt of the compliance officer's request for such a check. Based on the results of the audit, the responsible structural unit draws up and signs a report on the results of the review of the Message, containing a detailed description of the conclusions with links to supporting evidence. The report form is provided in appendix 2 to this Policy.

8.5.2 Initiation of an Internal Investigation in accordance with the internal document of the Partnership governing the conduct of Internal investigations.

8.5.3 Termination of consideration of a Communication in the cases provided for in paragraph of 8.7 of this Policy.

8.6 Decisions are made taking into account the nature of the Communication, the completeness of the information provided and the potential consequences.

8.7 Termination of consideration of a Communication is carried out in the following cases.:

- the nature of the violation has not been disclosed or the violation does not fall within the scope of this Policy.;

- the message is simultaneously addressed to several instances, including Partnership/government agencies, such Reports are considered within the framework of the Administrative Procedural Code of the Republic of Kazakhstan;

- when there are no experts in the Partnership to carry out the inspection/It is not possible to conduct an internal investigation and involve external experts. Such Messages, if possible, are sent by the Partnership to the authorized state bodies in accordance with their competence;

- if anonymous messages do not contain specific facts, confirmed information or evidence of violations that allow for objective verification, or are aimed at discrediting individuals without specific facts, confirmed information and contain threats;

- when the content of the received Message is similar to the Message that was previously reviewed in the Partnership.

8.8 When deciding to conduct an Internal Investigation in accordance with the procedure provided for in the internal documents of the Partnership, the Compliance Officer forms the composition of the commission or, if necessary, recommends that the responsible structural unit establish a commission to conduct an Internal investigation.

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The decision of the compliance officer is mandatory for all structural divisions and employees of the Partnership.

8.9 The procedure for conducting an Internal Investigation, determining the composition of the commission, the timing, and the rights and obligations of employees during an Internal Investigation are provided for in the internal document of the Partnership governing the conduct of Internal investigations.

8.10 Based on the results of the audit and/or Internal Investigation, the Compliance Officer notifies the Initiator of the message about the results of the audit and/or Internal Investigation and the measures taken, taking into account the requirements for maintaining confidentiality and protecting personal data. In case of an anonymous request in the Information System of the Hotline, information about the results of the audit and/or Internal Investigation is sent to a Compliance Officer, who sends the information received to the Operator for publication in the Hotline Information System.

8.11 The Supervisory Board and the management of the Partnership define the information related to the received Reports, the results of the investigation and the measures taken as very sensitive information. It is forbidden to discuss Reports, the results of the investigation and the measures taken in crowded places (elevators, cafes, canteen, etc.). Persons guilty of unlawfully disclosing any information related to the Reports received, the results of the investigation and the measures taken will be subject to liability measures provided for by applicable law and internal documents of the Partnership.

9 Reporting

9.1 The Compliance Officer is obliged to report to the Supervisory Board quarterly on the status of Official Investigations on Reports received by the Compliance Officer and the Operator. The information must contain at least:

- the number of Messages received during the reporting period (all received Messages to the compliance officer and Operator);
- the number of relevant Reports (accepted for consideration, for which there are some specific facts or preliminary information) on which an Internal investigation has been conducted;
- information about whether the Message has been confirmed or not (in case of partial confirmation (if part of the Messages has been confirmed), it is necessary to indicate what exactly has been confirmed);
- information about what measures have been taken against the Initiator of the message (termination of the employment contract, disciplinary penalties, information sent to authorized government agencies, etc.);
- information about what systemic measures have been taken to prevent the recurrence of the identified violations;
- information on the existence of Harassment against the Initiators of messages during the reporting period;
- the field of activity in which the violation was committed (procurement, labor conflicts, conflict of interests, corruption and fraud, etc.).

9.2. Upon request, reporting on the received materials of the Initiators of the messages is provided to the Compliance Service of the Fund.

10 Final provisions

10.1 This Policy is effective from the date of its approval by the Supervisory Board.

10.2 This Policy is introduced to replace the Policy of Proactive Informing of Tau-Ken Altyn LLP, approved by the decision of the Supervisory Board of the Partnership dated October 11, 2022 (Minutes No. 63).

10.3 This Policy is subject to change in case of amendments and additions to the legislation of the Republic of Kazakhstan, as well as to the internal documents of the Partnership at least once three years. Amendments and additions to this Policy are approved by the Supervisory Board of the Partnership.

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Appendix 1 to the Policy of Proactive Information

Types of violations to be registered in the Information System of the Hotline and considered in accordance with the Policy of Proactive Information, with the allocation of structural units responsible for reviewing Messages

Type	Subtype	Responsible structural unit
Corruption and abuse	Giving and receiving bribes, illegal rewards and gifts	Compliance Officer, Security Service
	Abuse of authority and official position	Compliance Officer, Security Service
	Lobbying for interests and providing unreasonable preferences	Compliance Officer, Security Service
	Criminal conspiracy and coercion	Compliance Officer, Security Service
Theft, fraud, and misrepresentation	Присвоение, растрата, кража и нецелевое использование активов	Compliance Officer, Security Service, SOTTE
	Fraud and financial fraud	Compliance Officer, Security Service, SBU
	Intentional misrepresentation of financial, accounting or any other reporting data	Company IAD
	Falsification of records and documents, forgery of documents	Company IAD
	Entering false information into documents regulating internal processes	Compliance Officer, Security Service,
	Discrimination on any grounds	The Ombudsman of the Society, SUPID
	Sexual harassment and harassment	Ombudsman

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Ethical violations and labor conflicts			
	Non-compliance with corporate culture and standards of conduct	Ombudsman, Supervisor, Compliance Officer	
	Violation of labor rights and unequal conditions of employment and work	Ombudsman, SUPID	
	Conflict of interest (without signs of corruption)	Compliance Officer	
Safety, health and ecology	Violations of occupational safety and health requirements	SOTTBE	
	Endangering the health of employees or third parties	SOTTBE	
	Violation of environmental regulations and environmental damage	SOTTBE	
	Unsafe working conditions	SOTTBE	
Information security and confidentiality	Disclosure of confidential information	OIB	
	Unauthorized disclosure of insider information	OIB, Compliance Officer	
	Cybercrimes and information security breaches	OIB	
	Violations of personal data protection requirements	OIB	
Violations of procedures and requirements	Violation of the requirements of procurement procedures	Procurement Service	
	Violations of antimonopoly legislation	Legal Service, Compliance Officer	
	Violations of sanctions legislation	Legal Service, Compliance Officer	

Other violations	Other violations of the law and internal requirements of the Company	Compliance Officer, Legal Service, SB
	Violations of ESG principles (environmental, social, managerial)	SOTTBE, SUPID, Compliance Officer

**Appendix 2 to the Policy of
Proactive Information**

Form

Report on the results of the review of the Message

(Name of the responsible department)

1. Basic information on Message

No. of registration of the Message in the Information System of the Hotline	
Date of registration of the Message in the Information System of the Hotline	
Date of receipt of the Message through other information channels	
The organization of the Group of companies in respect of which the appeal was received	
Information channel	
Message Subject	
Type of Message	
A subspecies of the Message	
Anonymous Message	Yes/ No ¹
Initiator of the message (full name, position)	
Summary of the Message	
Information about the persons to be checked	
Information about the inspectors (full name, position)	
Verification start date	
End date of verification	

2. Information about the information received during the verification process

Date	Method of obtaining information (interview/written request)	Full name of the examiner who conducted the interview/requested the documents	Full name, (position) of the interviewee/the one who provided the documents, his contact details	Description of the interview content or information provided

3. Documents reviewed during the audit

No.	Name (copy/original), date, document No.	Number of pages and copies	Note

¹ This section is filled in if a specific, difficult-to-understand, highly professional or non-obvious methodology was used during the fact-checking process.

4. Verification methodology

5 Information about the established facts of the violation

- 5.1. Confirmed facts
- 5.2. Partially confirmed facts
- 5.3. Unconfirmed facts
- 5.4. Facts that cannot be confirmed or refuted

6. Conclusions based on the results of the audit

7. Action plan based on the results of the audit

A plan is required /not required

No.	Name of the event	Period, date of execution	Responsible department/person

(position) (full name) (signature)

20_____

(specify the date of the report)

² The relevant information is provided in the subsections. Each established fact is numbered end-to-end in each of the sections. If there is no information, a “None” mark is placed.

³ Briefly indicate the main conclusions drawn from the results of the audit and state whether the facts have been confirmed.

⁴ The section is filled in if the results of the audit require the implementation of corrective measures.