

**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

Address of the meeting: Astana, A 194 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 seventh item on the agenda “On approval of the Anti-Corruption Policy of Tau-Ken Altyn LLP”, the Chairman of the Supervisory Board put this issue to the vote.

In accordance with subparagraph 33) of paragraph 46 of the Charter of Tau-Ken Altyn LLP, 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 Anti-Corruption Policy in accordance with Appendix No. 5 to the minutes.
2. To invalidate the Compliance Policy approved by the decision of the Supervisory Board No. 71 dated 20.04.2023.
3. Compliance Officer of Tau-Ken Altyn LLP (Shiabiden T.K.) to 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 extract is correct

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

R. Nabyev

Signed in MetaDoc

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



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		Identification number:	P-KO-01-26
		Version	01

Appendix No. 5 to the minutes of the meeting of
the Supervisory Board of Tau-Ken Altyn LLP
dated March 27, 2026 (Minutes No. 4-2026)

ANTI-CORRUPTION POLICY OF TAU-KEN ALTYN LLP

Tay-Ken Altyn	Anti-corruption policy	ABMS	
		Identification number:	P-KO-01-26
		Version	01

Content

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1 Purpose

This Tau-Ken Altyn LLP Anti-Corruption Policy (hereinafter – the Policy) defines the goals, principles and key elements of the management system aimed at preventing, detecting and suppressing corrupt practices. The Policy establishes mandatory requirements for all employees of the Partnership, as well as third parties acting on behalf of or in the interests of the Partnership.

For the purposes of this Policy and ensuring operational efficiency, the control methodology provided for in ISO 37001:2025 (including risk assessment, counterparty verification, and control measures) applies equally to all associated corruption risks identified by the Anti-Corruption Law.

2 Sphere of application

2.1 The provisions of this Policy apply to all employees of the Partnership, including employees engaged on the basis of contracts for the provision of paid services and outstaffing, covering all business processes, operational activities, corporate functions and management levels without exceptions.

2.2 The Policy applies to all activities of the Partnership, regardless of geographical location and applicable jurisdiction. The employees of the Partnership are obliged to comply with the requirements of this Policy both when carrying out activities on the territory of the Republic of Kazakhstan and abroad, if this does not contradict the mandatory requirements of the legislation of foreign states. In the event of a conflict between the requirements of this Policy and local legislation, employees are required to immediately notify the Partnership's compliance officer for appropriate clarifications and instructions.

2.3 This Policy also applies to third parties acting on behalf of, in the interests of, or jointly with the Partnership, to the extent provided for in relevant agreements and agreements.

2.4 The Policy is considered as an act of the employer in order to apply disciplinary measures for its violation in accordance with the labor legislation of the Republic of Kazakhstan.

3 Terms, definitions and abbreviations

3.1 The following terms and definitions are used in this Policy: _____

Term	Definition
administrative and economic functions	the right to manage and dispose of property on the balance sheet of the organization granted in accordance with the procedure established by the law of the Republic of Kazakhstan
close relative	parents (parent), children, adoptive parents (adoptive parents), adopted children, full and half siblings, grandfather, grandmother, grandchildren of an Employee, Official
relatives	full and half-siblings, parents and children of the spouse of an Employee, Official
bribery	offering, promising, granting, accepting, or extorting an undue advantage of any value (which may be financial or non-financial), directly or indirectly, and regardless of the place of commission, in violation of applicable law, as an incentive or reward to a person acting contrary to his duties, or in order to otherwise induce that person to illegal behavior

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internal analysis of corruption risks	The Partnership's activities to identify and study the causes contributing to the commission of corruption offenses
High corruption risk	the level of corruption risk at which there is a significant probability of committing corruption offenses without taking additional control measures
“Hotline”	unified centralized channels (Hotline), through which any employee, counterparty, client or other interested person (applicant) Partnerships may report the existence of reasonable suspicions and known facts of violations by the Partnership and its Officials and Employees of the applicable requirements of the legislation or internal documents of the Partnership, corruption crimes, illegal acts and other violations.
Due diligence	The process of identifying, evaluating, and understanding corruption risks associated with specific projects, transactions, business partners, or geographic regions
officials	Director of the Partnership, members of the Supervisory Board
Interested parties	individuals or legal entities who may influence, be affected by, or consider themselves affected by the Partnership's decisions and activities
Conflict of interest	a situation in which, in the performance of his official duties, an employee of a Partnership makes a decision, participates in decision-making, or performs other actions related to his position that affect or may affect the personal or material interests of the employee himself, his close relative, spouse, or relative, and affect or may affect the interests of the Partnership.
Corruption risk	For the purposes of this policy, the possibility of causes and conditions contributing to the commission of corruption offenses includes bribery.
Corruption	illegal use by persons holding a responsible public position, by persons authorized to perform public functions, by persons equated to persons authorized to perform public functions, by officials of their official (official) powers and related opportunities in order to obtain or extract personally or through intermediaries property (non-property) benefits and advantages for themselves or third parties, as well as the bribery of these persons by providing benefits and advantages

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a person performing managerial functions	an employee of a Partnership who performs organizational, administrative, or economic functions permanently, temporarily, or under special authority
organizational and administrative functions	the right granted in accordance with the procedure established by the law of the Republic of Kazakhstan to issue orders and orders binding on subordinates, as well as to apply incentive measures and disciplinary penalties against subordinates in these organizations
Payments for simplification of formalities	small payments to officials to speed up or enforce routine government activities that are prohibited by this Policy, regardless of their size and local customs.
gift	<p>material value, including but not limited to:</p> <ul style="list-style-type: none"> any type of payment offered or received, remuneration, cash, loans, mortgages and/or guarantees, contributions and/or sponsorship, gifts, benefits; beverages, food, and other goods; individual discounts, securities, gift certificates, invitations to watch sports games, theaters, excursions and other events, discount cards, coupons; provision of employment opportunities, education or medical care, performance of work (provision of services); provision of other property (non-property) benefits and advantages
anti-corruption measures	actions of the Partnership's employees within their authority aimed at preventing corruption (corruption prevention)
Worker	an individual who is in an employment relationship with a Partnership and directly performs work under an employment contract, as well as outstaffing employees
Anti-bribery management system (ABMS)	The Partnership's management system aimed at preventing, detecting and responding to bribery in accordance with the requirements of ST RK ISO 37001
Third parties	agents, consultants, intermediaries, suppliers, contractors, joint ventures, and other persons acting on behalf of, in the interests of, or in conjunction with the Partnership under contractual obligations

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3.2 The following abbreviations are used in this Policy:

Partnership - Tau-Ken Altyn LLP

Company - JSC NGK Tau-Ken Samruk.

Fund - JSC Samruk-Kazyna.

4 General provisions

4.1 This Policy has been developed in accordance with the current anti-corruption, administrative and criminal legislation of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan "On Combating Corruption", applicable international laws and standards, the Corporate Standard for the Compliance Function of the Samruk-Kazyna JSC Group, and other internal documents of the Partnership.

4.2 The Partnership requires unconditional compliance with the anti-corruption legislation of all applicable jurisdictions and business activities, as well as international standards in the field of anti-corruption and other requirements applicable to the Partnership, including the documents of Samruk-Kazyna JSC in the field of anti-corruption.

4.3 The Partnership undertakes to implement, maintain and continuously improve the anti-corruption management system in accordance with the requirements of ST RK ISO 37001. This Policy has been developed taking into account the provisions of this standard and is aimed at ensuring compliance with the best international practices, legislation of the Republic of Kazakhstan and internal documents of the Partnership.

4.4 The Partnership categorically prohibits any form of corruption, including bribery, bribery, abuse of official position, commercial bribery, illegal remuneration and other illegal actions aimed at obtaining personal gain or misrepresentation of financial statements. All cases of non-compliance with this Policy are considered a serious violation and may result in disciplinary, administrative or criminal liability.

4.5 The Policy sets out the Partnership's approaches to identifying, assessing and managing corruption risks, including issues of interaction with government agencies, conflict of interest management, due diligence when working with third parties, as well as the implementation of effective internal control, monitoring and incident response procedures.

4.6 The Policy serves as the basis for setting, reviewing and achieving the goals of the Partnership in the field of anti-corruption. These goals are formed on the basis of risk analysis, approved by management, implemented at all levels of management and evaluated using performance indicators.

4.7 The Policy is an integral part of corporate governance and is aimed at ensuring transparency and building trust on the part of internal and external stakeholders.

4.8 The Partnership ensures that anti-corruption requirements are included in all essential contracts with third parties.

5 Anti-corruption principles

5.1 The Partnership is guided by the following basic principles of anti-corruption:

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5.1.1 Zero tolerance: The Supervisory Board and the management of the Partnership confirm their unconditional commitment to the principles of integrity and zero tolerance for corruption in all forms and manifestations. The Partnership absolutely prohibits any form of corruption and bribery in all business transactions and interactions. No commercial or operational objectives can serve as an excuse for violating anti-corruption requirements. All manifestations of corruption will be strictly suppressed and the perpetrators will be brought to justice in accordance with the procedure established by the legislation and the Internal Revenue Service of the Partnership.

5.1.2 Inevitability of punishment: The Partnership guarantees that any corrupt or fraudulent act, as well as violation of the requirements of this Policy, will be promptly and objectively investigated, and the perpetrators will be subject to proportionate and unavoidable penalties in accordance with applicable law and internal documents of the Partnership, regardless of their level of position, work experience or other personal qualities.

5.1.3 Commitment to management and setting the “tone at the top”: management at all levels demonstrates an uncompromising attitude towards corruption by personal example, creates a culture of ethical behavior and ensures the creation of an environment in which employees feel safe when reporting violations.

5.1.4 Employee engagement: The Partnership ensures the active participation of all employees in the formation and maintenance of a culture of intolerance to corruption, encouraging open dialogue and proactive reporting of any suspicions or facts of violations.

5.1.5 Risk-based approach: The Partnership identifies, evaluates and manages corruption risks based on their likelihood and potential impact, applying control measures proportional to the level of risk. Anti-corruption measures should be proportionate to the identified risks and not create excessive obstacles to doing business.

5.1.6 Due diligence: The Partnership exercises due diligence when establishing and continuing business relationships with counterparties, when hiring employees and interacting with third parties, verifying their trustworthiness and reputation using procedures appropriate to the level of risk.

5.1.7 Transparency and accountability: The Partnership ensures the openness of its anti-corruption principles, regular reporting on the functioning of the anti-corruption system and the availability of information to all stakeholders. Employees are personally responsible for compliance with anti-corruption requirements.

5.1.8 Protection of applicants from harassment: The Partnership guarantees confidentiality and protection from harassment for employees and third parties who report facts or suspicions of corruption in good faith. Discrimination, harassment or other negative consequences are not applied to such persons.

5.1.9 Continuous improvement: The Partnership undertakes to continuously improve the anti-corruption management system through regular performance monitoring, internal audits, management review and implementation of corrective actions.

6 Planning the anti-corruption system

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6.1 Anti-corruption activities are planned on a systematic and risk-based basis, taking into account context analysis, assessment of corruption risks, internal and external environmental factors, as well as legal requirements and international standards.

6.2 The Supervisory Board approves strategic goals and directions for the development of the anti-corruption system for a period of 3 (three) years, reflecting the Partnership's priorities in terms of strengthening corporate ethics, strengthening internal control, developing a culture of integrity and generally improving the effectiveness of compliance and anti-corruption systems. Based on the results of the corruption risk assessment and review of the information provided by the Compliance Service, the Supervisory Board also forms separate instructions to eliminate identified deficiencies and reduce risks in specific business processes.

6.3 The Director annually approves anti-corruption goals and an annual anti-corruption plan, which includes the main activities of the anti-corruption program: training and informing employees, developing mechanisms for reporting violations, etc.

6.4 To assess the effectiveness of the implemented anti-corruption measures, the Partnership uses a system of key performance indicators that correspond to the established goals and objectives of the anti-corruption program. Indicators are developed based on the principles of objectivity, measurability and comparability, covering both preventive measures and responsive mechanisms. The indicators are monitored on a regular basis by a compliance officer.

7 The main elements of the anti-corruption system

7.1 Identification and assessment of corruption risks.

7.1.1 The Compliance Service, in cooperation with the interested structural divisions of the Partnership and in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Partnership, conducts systematic identification and assessment of corruption risks in all areas of activity in order to identify vulnerabilities and develop effective control measures. The assessment is based on a risk-based approach and includes an annual comprehensive internal analysis of all corruption risks involving all structural units, quarterly monitoring of the risk map and registry, as well as an unscheduled analysis of significant changes in operations, organizational structure, the introduction of new products and services, entry into new markets or changes in the regulatory environment.

7.1.2 The risk analysis process covers all key business processes and functions, including interaction with government agencies, procurement, personnel management, financial transactions, work with third parties, and others. Risks are classified according to the levels of impact and probability of occurrence using qualitative and quantitative analysis methods in accordance with the internal documents of the Partnership's risk management system. The results of the assessment are documented in the consolidated risk register and serve as the basis for the development, implementation and adjustment of control and minimization measures, as well as for making managerial decisions on the allocation of resources and priorities in the field of anti-corruption

7.1.3 The Partnership analyzes the factors of the internal and external environment affecting corruption risks, including organizational structure, business processes, corporate culture, regulatory environment, industry specifics and geographical factors.

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The results of the analysis are used to determine the context of the functioning of counteraction systems and update the risk assessment.

7.1.4 The Partnership identifies internal and external stakeholders that influence the effectiveness of counteraction systems or are exposed to related risks, and develops differentiated approaches to interaction based on their needs and expectations.

7.2 Leadership and involvement of senior management (“Tone at the top”).

7.2.1 The top management of the Partnership, including members of the Supervisory Board, the Director of the Partnership and directors of business areas, forms an understanding among the employees of the Partnership of the complete unacceptability of all forms and manifestations of corruption, demonstrates a personal example of ethical behavior, compliance with applicable anti-corruption legislation and relevant requirements of the Partnership in the performance of their official duties.

7.2.2 “Tone at the top” is aimed at forming and maintaining a corporate culture in the Partnership based on the principles of objectivity, honesty, transparency and openness.

7.2.3 The management of the Partnership develops a program of anti-corruption measures and monitors its compliance

7.3 Personnel management.

7.3.1 The Partnership adheres to the principles of objectivity and honesty when making personnel decisions. In order to eliminate corruption risks in the recruitment, evaluation, promotion and dismissal of personnel, the Partnership has established and approved internal regulatory documents governing transparent procedures for the selection, hiring, evaluation, promotion of personnel, and rules for compliance verification of candidates for employment.

7.3.2 Employees, when applying for a job or continuing an employment relationship with a Partnership, assume anti-corruption restrictions in the form of consent to the adoption of anti-corruption restrictions in accordance with Appendix 1 to this Policy.

7.4 Communication and training.

7.4.1 The communications system includes regularly informing all employees about the principles and requirements of anti-corruption through corporate communication channels, conducting thematic campaigns and events, as well as ensuring the availability of up-to-date information on policies, procedures and changes in anti-corruption legislation. Special attention is paid to explaining the practical aspects of applying anti-corruption requirements in daily activities and providing opportunities for advice on complex ethical issues.

7.4.2 Educational programs include mandatory basic training for all employees upon employment, regular refresher training at least once a year, as well as specialized programs for employees in high-risk corruption positions and senior management. The training is conducted in various formats, including face-to-face seminars, online courses, practical cases and simulations, with mandatory knowledge testing and documentation of the results. The effectiveness of training programs is regularly evaluated through feedback from participants, monitoring of changes in behavior, and analysis of the dynamics of violations.

7.5 Proactive information.

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7.5.1 The Partnership ensures the operation of an accessible, confidential and secure system for informing about facts or suspicions of corruption, including multiple communication channels for employees and third parties. The system provides the possibility of anonymous and personal appeals through a hotline, web portal, e-mail, postal addresses and personal appeals to authorized persons, providing round-the-clock availability and the possibility of submitting messages in the state, Russian and English languages.

7.5.2 The Partnership guarantees the confidentiality of the processing of all incoming messages, the protection of applicants' personal data and the non-disclosure of information to persons not involved in the consideration of the application. Special attention is paid to protecting applicants from harassment, discrimination, harassment and other negative consequences associated with reporting violations in good faith, including the application of disciplinary measures to persons who retaliate against applicants.

7.6 Conducting official investigations and bringing perpetrators to justice.

7.6.1 The Partnership ensures comprehensive verification of all facts related to suspected violations using objective, independent and structured procedures. As part of the procedural approach, all incoming messages and data are subjected to an initial analysis in order to confirm their reliability and the validity of suspicions.

7.6.2 If signs of possible violations are identified, an internal investigation is initiated aimed at a comprehensive study of the situation, including the collection of evidence, an analysis of the circumstances and causes, as well as an assessment of the consequences. At the same time, the compliance officer has the right not to consider anonymous appeals if they do not contain specific facts, confirmed information or evidence of violations that allow for an objective check, or are aimed at discrediting individuals without specific facts, confirmed information and contain threats.

7.6.3 Based on the results of the investigation, the Partnership takes systematic measures aimed at eliminating the identified causes and conditions contributing to violations. Corrective actions include improving internal procedures, strengthening control at the stages of business processes, and introducing additional preventive mechanisms. In parallel, disciplinary measures are applied against the perpetrators, regardless of their position or status, and other measures provided for by the legislation of the Republic of Kazakhstan.

7.7 Conflict of interest settlement.

7.7.1 The Partnership implements a comprehensive approach to identifying and resolving conflicts of interest, ensuring transparency and preventing cases that may negatively affect the objectivity of decisions.

7.7.2 The employees of the Partnership complete the mandatory declaration of conflicts of interest both on a periodic basis and in the event of circumstances that may create a conflict of interest. All submitted declarations are carefully analyzed in order to assess the possible impact of a conflict of interest on the actions of employees or the results of their work. If a potential conflict is detected, these circumstances are taken into account when making decisions, including the possibility of changing the composition of participants in the process, redistributing responsibilities, or involving independent experts.

7.7.3 In order to manage conflicts of interest, the Partnership develops procedures aimed at systematizing the process of declaring, storing and processing data.

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An important aspect is the regulation of the giving and receiving of gifts and tokens of hospitality.

7.8 Gifts and representation expenses.

7.8.1 The Partnership recognizes the exchange of business gifts and the implementation of representative expenses, including business hospitality, as a necessary part of doing business and a generally accepted business practice.

7.8.2 The implementation of representative expenses, including business hospitality of a Partnership with third parties, must meet the following criteria:

1) fully comply with the norms of the current legislation of the Republic of Kazakhstan, this Policy and internal documents of the Partnership;

2) be reasonably reasonable, proportionate, and not considered luxury items;

3) not to represent a hidden reward for a service, action, omission, connivance, patronage, granting rights, making a specific decision on a transaction, agreement, license, permit, etc., or an attempt to influence the recipient for an illegal or unethical purpose;

4) the display of hospitality is not intended and cannot be perceived as intended to influence or persuade a person to act in a certain way, or to reward that person for fulfilling his/her role or function;

5) not to create reputational risk for the Partnership and its employees, as well as other persons in the case of disclosure of information about gifts or representation expenses;

6) the display of hospitality is appropriate and does not exceed the limits provided for in this Policy, and does not violate the hospitality policy of the relevant third-party organization.;

7) any display of hospitality must be carried out in accordance with the legislation of the Republic of Kazakhstan and the internal documents of the Partnership;

8) it is not allowed to offer hospitality tokens and gifts to civil servants, persons performing managerial functions in quasi-public sector entities and their family members. It is also not allowed to offer or give gifts if it is known that accepting a gift is unacceptable for the recipient.

7.8.3 Employees and Officials of the Partnership are prohibited from offering, promising, giving, providing, demanding, requesting, accepting any gifts/signs of business hospitality in cases where such actions/gifts:

- have a direct or indirect purpose to selectively influence

decision-making that affects the preservation, expansion or optimization of the Partnership's activities or the receipt of any advantage or benefit;

- create reputational or other risk for the Partnership and its employees in the event of disclosure of information about gifts or representation expenses, or hospitality;

- are cash or non-cash funds,

securities, precious metals, or represent other types or equivalents of cash and/or luxury goods;

- are not reasonably justified in terms of the subject matter, cost, and specific case.

7.8.4 Gifts and money received without the knowledge of Officials, persons performing managerial functions, and (or) their family members are subject to gratuitous transfer/transfer to the authorized state body /the republican budget in accordance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan.

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7.8.5 It is prohibited to accept gifts and tokens of hospitality from any potential participant in purchases carried out by the Partnership. If there are doubts about the compliance of a business gift or event with the requirements of this Policy, an official or employee of the Partnership should consult with the direct supervisor or compliance officer of the Partnership.

7.9 Provision of sponsorship and charitable assistance.

7.9.1 The Partnership, being a subsidiary of the Company and a member of the Fund's group of companies, carries out its sponsorship and charitable assistance activities within the framework of the Fund's internal regulatory documents related to these issues.

7.9.2 The Partnership does not prohibit officials and employees from providing charitable and/or sponsorship assistance on its behalf.

7.9.3 When participating in public associations, officials and Employees of the Partnership are prohibited from offering, giving, promising, or making payments, depositing property, or giving gifts on behalf of the Partnership in order to obtain or maintain advantages for the Partnership's activities.

8 Monitoring, audit and management analysis

8.1 The Partnership conducts regular internal audits of the anti-corruption system in order to assess its effectiveness, efficiency and compliance with the requirements of the internal regulatory framework, legislation of the Republic of Kazakhstan and international standards, including ST RK ISO 37001.

8.2 The Partnership conducts a management analysis of the anti-corruption system at least once a year. The analysis is initiated and organized by the compliance officer and is conducted in the format of a meeting with the participation of the management of the Partnership and relevant structural units. The analysis examines the results of the internal audit, the degree of implementation of the annual plan, the execution of ongoing activities, as well as the results of work on appeals, internal investigations, the application of corrective measures and the maintenance of a culture of ethical behavior.

8.3 The results of the management analysis are documented and used to update policies, procedures, allocation of resources and priorities, and are presented to the Supervisory Board to assess the effectiveness of anti-corruption measures.

8.4 The Compliance Officer carries out a systematic assessment and monitoring of effectiveness of anti-corruption measures. The assessment covers the degree of implementation of the planned measures, compliance with procedures, practical risk reduction and the development of a culture of integrity. Based on the results of the assessment, recommendations are made to improve the system, and corrective actions are initiated if necessary. The final information on the assessment is brought to the attention of the Supervisory Board as part of the reporting on the functioning of the anti-corruption system.

8.5 The Supervisory Board oversees the effective functioning of the anti-corruption system, ensuring its compliance with the strategic objectives of the Partnership and the requirements of the legislation. At least once a year, the Compliance Service provides the Board of Directors with summary information on the implementation of anti-corruption measures, the results of internal audit and management analysis, identified violations, measures taken and the state of corporate culture.

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8.6 The anti-corruption system in the Partnership is being developed based on the principle of continuous improvement and adaptation to changes in the external and internal environment.

9 Roles and responsibilities in the anti-corruption system

9.1 The Supervisory Board provides overall management of the anti-corruption system, approves key internal documents, defines strategic guidelines and oversees the effectiveness of measures taken.

9.2 The Director of the Partnership organizes the implementation of the system at the operational level. It approves anti-corruption goals and plans, makes decisions on corrective actions, reviews reports on the progress of programs and assignments, and ensures the development of a culture of ethical behavior. ensures the provision of resources, including personnel, financial, organizational and technical, for the effective implementation of anti-corruption measures and the fulfillment of the tasks of the compliance officer.

9.3 The Compliance Officer performs the functions of the methodological and operational center of the anti-corruption system. The Compliance officer organizes the risk assessment, develops and coordinates the implementation of plans and measures, monitors the effectiveness of the system, informs the Supervisory Board about the results, initiates a management analysis and participates in the formation of corrective and preventive measures. A Compliance Officer has independence, direct access to the Supervisory Board, and the necessary authority and resources to carry out their tasks. The Partnership guarantees the absence of conflicts of interest and unjustified interference in the activities of the compliance officer.

9.4 The heads of the Partnership's structural divisions are responsible for implementing the provisions of this Policy in their fields of activity, integrating anti-corruption procedures into business processes, participating in risk assessment and implementing corrective measures. They ensure that subordinate employees comply with the requirements of anti-corruption legislation and internal procedures, and are also required to promptly inform the compliance officer of possible violations. Heads of structural divisions promote the formation of a culture of intolerance to corruption and organize the participation of their employees in training and communication on ethics and integrity issues.

9.5 Employees of the Partnership are required to comply with the provisions of this Policy, participate in training events, follow established procedures and faithfully report facts or suspicions of corruption. Each employee is personally responsible for ethical behavior, compliance with the law and the principles established by the Partnership.

10 Final provisions

10.1 The Compliance Officer ensures that all employees of the Partnership are required to familiarize themselves with this Policy when applying for a job, as well as when making changes to it. All employees of the Partnership sign an obligation to comply with the norms of this Policy, in accordance with Appendix 2 to this Policy, which is stored in the employee's personal file.

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10.2 Employees of the Partnership, who are persons equated to persons authorized to perform state functions and defined by the Law of the Republic of Kazakhstan “On Combating Corruption”, assume anti-corruption restrictions by signing an application for the adoption of anti-corruption restrictions, in accordance with Appendix 3 to this Policy, which are stored in the personal files of such employees.

10.3 The Partnership ensures that this Policy is widely available to all interested parties. The Policy is published on the Partnership's official website, posted in the corporate information system, and made available upon request.

10.4 The date of approval of the Policy by the Supervisory Board of the Partnership shall be considered the effective date of this Policy.

10.5 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 every three years. Amendments and additions to this Policy are approved by the Supervisory Board of the Partnership.

10.6 Issues not regulated by this Policy are regulated by the applicable legislation of the Republic of Kazakhstan, as well as internal documents of the Partnership.

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**Appendix No. 1
Form**

Obligation to comply with the Anti-Corruption Policy of Tau-Ken Altyn LLP

I, _____

confirm that I am aware of the provisions of the Tau-Ken Altyn LLP Anti-Corruption Policy and undertake to comply with them.

I am aware that, in accordance with the Policy, all employees of Tau-Ken Altyn LLP, including myself, are prohibited, directly or indirectly, personally or through the mediation of third parties, from participating in corrupt activities, including offering, giving, promising, requesting or receiving bribes and payments to simplify formalities in any form, including, in the form of funds, valuables, services and other benefits, to any persons and from any persons or organizations, including commercial organizations, government agencies, Kazakhstani civil servants, private structures and their representatives.

I undertake to inform my immediate supervisor, the compliance officer of Tau-Ken Altyn LLP, or through confidential information channels about information I have about upcoming, committed, or ongoing corruption offenses, as well as suspicions about the legality or ethics of my actions, as well as actions, omissions, or suggestions of other employees, contractors, or other persons., which interact with Tau-Ken Altyn LLP.

I have been warned about the possibility of disciplinary, administrative, civil and/or criminal liability for violations of anti-corruption legislation and Policies.

If I have additional questions about the principles and requirements of the Policy and applicable anti-corruption legislation, I can contact the compliance officer of Tau-Ken Altyn LLP or the direct head of the department.

Date _____
Signature _____

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Appendix No. 2 Form

Full name
Position

Statement on the adoption of anti-corruption restrictions

Hereby, in accordance with the Law of the Republic of Kazakhstan “On Combating Corruption”, I assume anti-corruption restrictions on:

- 1) the inadmissibility of joint service (work) of close relatives, spouses and relatives¹;
- 2) the use of official and other information that is not subject to official dissemination in order to obtain or extract property and non-property benefits and advantages;
- 3) acceptance of gifts in connection with the performance of official duties in accordance with the legislation of the Republic of Kazakhstan². I also undertake to notify my family³ members of similar anti-corruption legislation requirements;
- 4) participation in gambling and (or) betting in gambling establishments that fall under the definition provided for by the Law of the Republic of Kazakhstan “On Gambling”, as well as participation in gambling and (or) betting in places not designated for this purpose or in gambling and (or) betting conducted through the use of networks telecommunications, including the Internet⁴.

I am aware of the responsibility established by the current legislation of the Republic of Kazakhstan for non-acceptance of anti-corruption restrictions and their non-compliance.

Date _____
Signature _____

¹ **Joint work** involves holding positions that are directly subordinate to positions held by close relatives, spouse and/or relatives, their direct subordination, as well as holding positions in the same management body (supervisory board, executive body) of a quasi-public sector entity.

Close relatives are parents (parent), children, adoptive parents (adoptive parents), adopted children, full- and half-siblings, grandparents, grandchildren, and relatives are full- and half-siblings, parents and children of a spouse.

² **The procedure for handling gifts** is established by article 12 of the Law on Combating Corruption. For detailed explanations, please contact the Compliance Service.

³ **Family members** include a spouse, parents, children, including adults, and dependent persons who permanently reside together.

⁴ **A bet** – a risk-based agreement entered into by participants among themselves or with the gambling business organizer for the outcome of an event involving a win in which they do not participate.

Gambling – a risk-based agreement involving a win, concluded by participants among themselves or with the organizer of the gambling business for the outcome of an event in which these persons participate

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Appendix No. 3
Form

Declaration of Conformity/on compliance with the Anti-Corruption Policy of Tau-Ken Altyn
LLP

I, _____
confirm that I have not violated the provisions of the Tau-Ken Altyn LLP Anti-Corruption Policy in the previous 20__, namely:

did not directly or indirectly, personally or through the mediation of third parties, participate in corrupt practices, including by offering, giving, promising, requesting or receiving bribes and payments to simplify formalities in any form, including in the form of cash, valuables, services or other benefits, in any way or to persons and from any persons or organizations, including commercial organizations, government agencies, Kazakhstani civil servants, private structures and their representatives.

In cases where such information was at my disposal, I informed my immediate supervisor, the compliance officer of Tau-Ken Altyn LLP, or through confidential information channels about information I had about upcoming, committed, or ongoing corruption offenses, as well as suspicions about the legality or ethics of my actions, and actions, omissions, or suggestions of other employees, contractors, or other persons who interact with Tau-Ken Altyn LLP.

I have been warned about the possibility of disciplinary, administrative, civil and/or criminal liability for violations of anti-corruption legislation and Policies.

If I have additional questions about the principles and requirements of the Policy and applicable anti-corruption legislation, I can contact the compliance officer of Tau-Ken Altyn LLP or the direct head of the department.

Date _____
Signature _____

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Appendix No. 4

Anti-corruption memo

1. What kind of behavior is prohibited? The policy of Tau-Ken Altyn LLP (hereinafter – the Partnership) in the field of anti-corruption (hereinafter referred to as – the Policy) prohibits any form of corruption: abuse of official position, giving bribes (Active bribery), receiving bribes (Passive bribery), mediation, abuse of authority, commercial bribery or other illegal use by an individual of his official position contrary to the interests of the Partnership and the state, to obtain benefits in the form of money, valuables, other property or services property rights, other property rights for oneself or third parties, or the illegal provision of such benefits to the specified person by other individuals, as well as the commission of these acts on behalf of or in the interests of a legal entity.

2. What is a Bribe?

A bribe – the acceptance of material values (objects or money) or any kind of property benefit or services for an action (or, conversely, inaction) in the interests of the payer, which this person could or should have committed by virtue of his official position. A bribe can be something of value, including a financial or other advantage.

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 hospitality tokens (e.g. travel, meals, and accommodations),
- services,
- loans and valuable collateral,
- property or any share in property of any kind,
- protection from penalties and exemption from any obligation,
- anything provided for inappropriate remuneration,
- providing practice, work experience, or offering temporary or permanent employment (including providing the same services/benefits to Close relatives, spouses, and Relatives),
- Political or charitable contributions. Evidence that a Bribe is a necessary measure in any local industry, business, profession, or vocation cannot be used to defend bribery.

3. Active bribery

4. For Employees/Officials of the Partnership are always unacceptable:

- Offer, promise, or pay bribes, including Incentive Payments, other illegal payments, or benefits to or for a politically exposed person, or at the direction of such persons;
 - Facilitate, mediate, assist, or support such behavior. A violation of the Policy occurs if an Employee/Official of the Partnership offers, tries to pay, or pays, or is an intermediary in paying a bribe to a politically significant person, even if the Employee/Official of the Partnership does not benefit in return.

5. Passive bribery

Employees/Officials of the Partnership are prohibited from: asking, demanding, agreeing to receive or receive a bribe from a politically significant person.

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This prohibition applies regardless of whether the Employee receives a bribe for his own benefit or on behalf of another person. A violation of the Policy occurs if an Employee/Official of the Partnership requests or demands a bribe; the bribe may not actually be paid.

6. What is Commercial bribery?

Commercial bribery – the illegal transfer of money, securities or other property to a person performing managerial functions in a commercial or other organization, as well as the illegal provision of property services to him for using his official position, as well as general patronage or connivance in the service in the interests of the person engaged in bribery.

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

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

- to encourage or encourage inappropriate behavior on the part of the recipient or another person (Commercial Bribery); or
- influence a politically significant person (illegally or otherwise) in the performance of their official duties in order to gain or retain a commercial advantage.

Giving an advantage is probably a Bribe if:

- It is illegal under the relevant anti-corruption and bribery laws;
- it creates an obligation or the appearance of an obligation for the other party;
- it is intended to incite a person to act or omit in order to provide certain benefits or general support to the person providing the advantage or the organization of such person;
- it is provided to a politically significant person in order to influence an employee in relation to his official duties, to speed up the performance of official duties, or to receive general support from such a person; it is unreasonable in terms of cost, frequency, or method of provision.

8. What else is prohibited?

It is also unacceptable for you:

violate financial discipline, including criminal acts such as stealing funds and making false reports, insider trading, money laundering or misappropriation of funds;

- to use or offer privately to other persons access to or use of the Partnership's resources, including assets, funds, or intellectual property, without prior permission from the Partnership; to attempt to incite an individual employee of a commercial organization, a government organization (in whole or in part), or a politically significant person to illegal actions;
- offer, give, or authorize Bribes for Commercial bribery, directly or indirectly, through an agent or associate: a. to a politically exposed person, or b. to a manager, employee, or employee of a commercial or other organization;
- to offer or provide an unauthorized benefit (property or other) to an employee of any competitor, supplier or customer of the Partnership, which may lead to unfair competitive advantage and violation of applicable competition regulations, such as any benefit that may lead to an undue advantage of the Partnership over its competitors
- to use any connections that you may have with politically exposed persons in order to illegally gain a competitive advantage in relation to KPI;

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- do not report signs of illegal payments or tokens of attention in accordance with the Policy or any circumstances that give reason to suspect such behavior;
- take actions, including fraudulent false statements, to persuade a party to obtain financial or other benefits, or to evade obligations;
- attempt to conceal or conceal any of the above.