

 **APPROVED**
by the Decision of the Management Board of
Beineu-Shymkent Gas Pipeline LLP
Minutes of Meeting dated April "20", 2021

№ 2021-17

AMENDMENTS AND SUPPLEMENTS №2
to Business ethics code of Beineu-Shymkent Gas Pipeline LLP
approved by the decision of the Management Board of Beineu-Shymkent Gas
Pipeline LLP on July 22, 2016 (Minutes of Meeting No.2016-27)

The following amendments and supplements shall be introduced to the Business ethics code of Beineu-Shymkent Gas Pipeline LLP, approved by the decision of Beineu-Shymkent Gas Pipeline LLP Management Board on July 22, 2016 (Minutes of Meeting No.2016-27) (hereinafter – the Code):

1. To supplement the Code with article 26-1 “Key principles of combating corruption”:

“Within the frames of its activity the Partnership is guided by the following principles of combating corruption:

26-1.1. The principle of “zero tolerance” (rejection of corruption in all its forms and manifestations) - complete prohibition to Employees and Officials of the Partnership, as well as other people acting on behalf of the Partnership and/or in its interests, to participate directly or indirectly, personally or through any Mediation in corrupt practices independently on business practice in this or another country;

26-1.2. The principle of "Tone from the top" - officials of the Partnership shall be an example to the Partnership employees by their behavior on respecting and promoting high ethical standards of business conducting and rejection of corruption in any form;

26-1.3. The principle of due diligence - taking set of measures and actions aimed at receipt of the required and reliable information on Counter-agent to minimize the risk of business relations with Counter-agents, which may be involved into corrupt practices or tolerant to manifestations of corruption;

26-1.4. The corruption prevention principle - the Partnership takes preventive measures in advance to prevent , that is introduction of corruption of corporate culture, organizations structure, rules and procedures aimed primarily at identifying corruption risks and their minimization;

26-1.5. The principle of inevitability of punishment - the Partnership declares uncompromising attitude to all forms and manifestations of fraud and corruption at all levels of corporate governance. The bringing of guilty people to responsibility is performed regardless of their position and the period of work in the Partnership and other relationships with them in accordance with the procedure established by the laws and internal regulatory documents of the Partnership;

26-1.6. Monitoring and control - the Partnership carries out monitoring of the implemented procedures to prevent and fight against corruption, controls their observance and regularly improves them;

26-1.7. Cooperation in the field of combating corruption - the Partnership recognizes the general social nature of the problem of corruption and the necessity to counter it, both by measures to be implemented in the framework of the state policy, and through development of intolerance towards corruption by Employees, Officials of the Partnership and the Partnership's Counter-agents;

26-1.8. Involvement of employees in the fight against corruption - the Partnership sets the task to develop the personal position of corruption rejection in all its forms and manifestations by Employees. For these purposes, the Partnership shall take all necessary measures for the implementation of the Policy at all levels of the arrangement and its bringing to the attention of its Employees, as well as other concerned parties. The Partnership contributes the increase of anti-corruption culture level of Employees by their regular training to basic requirements of the Policy and its practical application;

26-1.9. The principle of reliable reporting - the requirements of legislation and rules of keeping the reporting documentation are strictly observed in the Partnership. Each fact of business life shall be subject to formalization with the accounting source document. Tampering or falsification of accounting, managerial and other accounting data or confirming documents are not allowed."