

APPROVEDby the Decision of the Supervisory Board of
Beineu-Shymkent Gas Pipeline LLPMinutes No. 2022 - 17dated October 10, 2022

**Anti-corruption enforcement
POLICY
of
Beineu-Shymkent Gas Pipeline LLP**

P-BSGP-CO-01-22

Beineu-Shymkent Gas Pipeline LLPAlmaty
2022

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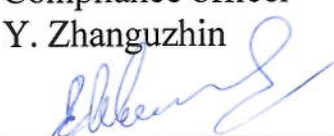
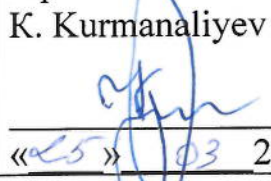

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**11 ЛИСТ УЧЕТА КОПИЙ ДОКУМЕНТА/COPIES REGISTRATION
SHEET31****1 PURPOSE**

1.1. This Anti-Corruption Enforcement Policy of Beineu-Shymkent Gas Pipeline LLP (hereinafter – the Policy) has been developed in accordance with the Law of the Republic of Kazakhstan "On anti-corruption management", other legislative acts of the Republic of Kazakhstan in the field of anti-corruption enforcement, regulating the activities of Beineu-Shymkent Gas Pipeline LLP (hereinafter the Partnership).

1.2. The policy establishes:

- 1) the fundamental principles of anti-corruption enforcement in the Partnership;
- 2) managerial and organizational basics for the prevention of corruption offenses;
- 3) actions to minimize and prevent corrupt practices;
- 4) holding the compliance audits on the facts of violations;
- 5) development of commitment with the employees to strictly comply with the legislative acts of the Republic of Kazakhstan, as well as internal regulations governing the activities of the Partnership;
- 6) general principles of accepting, giving gifts, providing and accepting acts of hospitality in the Partnership, as well as the activities of the structural subdivisions of the Partnership when registering gifts and manifesting the acts of hospitality.

1.3. The main purpose of this Policy is the commitment of the Partnership officials and employees to high behavioral standards, maintaining the open and honest business, strengthening the business reputation and increasing trust in the Partnership. The provisions of this Policy and the Business Ethics Cod are mutually complementary.

2 SCOPE OF APPLICATION

2.1. The requirements of this Policy shall be applicable to all employees of the Partnership (including the out-staffing employees).

2.2. The Partnership recommends its counter-agents to adhere to the requirements of this Policy and ensure compliance with this Policy requirements by their employees.

2.3. This Policy shall be the subject to posting on the corporate web-site of the Partnership.

2.4. Since the approval date of this Policy by the authorized body of the Partnership, the P-BSGP-LG-01-21 Anti-corruption enforcement policy of Beineu-



Shymkent Gas Pipeline LLP, approved by the decision of the Partnership Management Board dated October 28, 2021 (Minutes No.2021-52), shall be deemed to have lost force.

3 REGULATORY REFERENCES

The references to the following regulatory documents have been applied in this Policy:

3.1.1 Criminal Code of the Republic of Kazakhstan;

3.1.2 Law of the Republic of Kazakhstan "On anti-corruption management";

3.1.3 Code of the Republic of Kazakhstan "On Administrative Offenses";

3.1.4 Labor Code of the Republic of Kazakhstan;

3.1.5 Law of the Republic of Kazakhstan "On the limited and additional liability partnerships";

3.1.6 Charter of Beineu-Shymkent Gas Pipeline LLP;

3.1.7 "Business ethics code of Beineu-Shymkent Gas Pipeline LLP", approved by the decision of the Partnership Management Board dated July 22, 2016 (Minutes No.2016-27);

3.1.8 RU-BSGP-LG-01-17 "Rules on development, agreement and approval of internal regulatory documents in Beineu-Shymkent Gas Pipeline LLP, approved by the decision of the Partnership Supervisory Board dated December 11, 2017 (Minutes No.2017-22);

3.1.9 RU-BSGP-HSE-01-20, "Rules on managing the documented information of Integrated management system" approved by the decision of the Partnership Management Board dated July 22, 2020 (Minutes No. 2020-26);

3.1.10 INS-BSGP-HSE-01-20, "Instruction for formalization and defining structure of internal regulatory documentation of Beineu-Shymkent Gas Pipeline LLP" approved by the decision of the Partnership Management Board dated July 22, 2020 (Minutes No.2020-26).

4 TERMS, DEFINITIONS AND ABBREVIATIONS

4.1. Terms, definitions

This Policy operates the following terms and relevant definitions:

Administrative functions - the right to manage and dispose of the property on the Partnership balance granted in the manner prescribed by the law of the Republic of Kazakhstan and the internal documents of the Partnership.

Anti-corruption legislation - the Law of the Republic of Kazakhstan "On anti-corruption management" and other regulatory legal acts relating to anti-corruption enforcement.



Anti-corruption restrictions - the restrictions established by the Law of the Republic of Kazakhstan "On anti-corruption management" and aimed at prevention of the corruption offenses.

Associated persons - members of the Supervisory Board, Management Board of the Partnership, as well as people rendering the services for the Partnership or acting on its behalf.

Out-staffing employees – persons, involved under the civil legal contracts for performance of work in the Partnership.

Close relatives - parents (parent), children, adoptive parents, adoptees, full blood and half-blood siblings, grandparents, grandchildren.

Internal analysis of corruption risks - activity of the Partnership on identification and studying the reasons contributing to corruption risks committing.

Officials – members of the Supervisory Board, members of the Management Board and other officials of the Partnership equivalent to persons authorized for performance of the state functions according to the Law of the Republic of Kazakhstan "On anti-corruption management" and this Policy.

People equivalent to people authorized to perform the government functions - a person performing managerial functions in the Partnership, as well as the person authorized to make decisions on arrangement and holding the purchases, or responsible for the selection and implementation of the projects financed on account of state budget and the National fund of the Republic of Kazakhstan, who is holding the position equal or above the leader of the independent structural subdivision.

Person performing managerial functions - a person who performs the organizational/administrative or administrative functions in the Partnership temporarily or basing on the specially vested powers.

Material remuneration - material valuables, profit or privilege handed over for the benefit of or received from the third parties.

Conflict of interests - inconsistency between the personal interests of officials, people equivalent to people authorized to perform the government functions, persons performing managerial functions, employees and their official powers when the personal interests of these people may cause non-fulfillment and (or) improper performance of their official duties.

Corruption - illegal use by the Partnership officials and employees of their official (duty) powers and related opportunities in order to obtain or achieve personally, or through intermediaries, the property (non-property) profits and privileges for themselves or the third parties, as well as bribery of these people by providing profits and privileges.

Corruption risk - the possibility for occurrence of reasons and conditions contributing to corruption offenses committing.



Corrupt practices - intentional acts (action or inaction) committed by an official, an employee of the Partnership, using his/her official position in order to obtain profits in the form of property or other benefits.

Corruption offense - the illegal culpable act (action or inaction) having the corruption signs, for which the administrative or criminal responsibility is established by the law.

Counter-agent - an individual or legal entity which the Partnership concluded or intends to conclude a contract/agreement with.

Organizational-management functions - the right, granted in the manner prescribed by the law of the Republic of Kazakhstan and the internal documents of the Partnership, to issue orders and instructions that are binding upon the employees, as well as to apply incentive measures and disciplinary sanctions towards the employees.

Compliance officer – an employee of the Partnership, responsible for ensuring the observance by the Partnership and its employees of the legislation of the Republic of Kazakhstan in the sphere of anti-corruption management.

Anti-corruption enforcement - the activities of the Partnership and its officials and employees within their powers to prevent corruption, including establishment of the anti-corruption culture, identification and elimination of the reasons and conditions causing corruption offenses committing, as well as identification, suppression of corruption offenses and elimination of their consequences.

Corruption prevention - the activities of the Partnership on studying, identification, restriction and elimination of the reasons and conditions corruption offenses committing through developing and implementing the system of preventive measures.

Representational expenses - expenses for holding the receptions, attending the cultural and entertainment events, buffet service, payment for interpreting services etc.

Employee – a person who is employed by the Partnership and directly performing the work under the labor contract, as well as other persons engaged under the civil law contracts for the works performance.

In-law relatives - brothers, sisters, parents and children of the husband (wife).

The definitions used, but not disclosed in this Policy, correspond to the definitions used in the legislation of the Republic of Kazakhstan, the Charter and other internal documents of the Partnership.

4.2 Abbreviations

The following abbreviations are used in this Policy:

HR – Human Resources Department;

Partnership – Beineu-Shymkent Gas Pipeline LLP;

LG – Legal Department.



5 ACTIVITY DESCRIPTION

5.1 Fundamental principles of anti-corruption enforcement

5.1.1. The fundamental principles of anti-corruption enforcement in the Partnership are as follows:

1) **zero tolerance to any form of corruption** - The Partnership adheres to the principle of total rejection of corruption in any forms and manifestation while carrying out its activities.

The principle of "zero tolerance" (rejection of corruption in all its forms and manifestations) means strict banning for the associated people, officials and employees of the Partnership, acting on behalf of the Partnership or in its interests, to participate directly or indirectly, personally or through any mediation in corrupt practices regardless the business practice applicable in this or that country;

2) **top management commitment and establishment of the "tone from the top"** - The Supervisory Board and the Management Board of the Partnership play the key role in fostering a culture of intolerance to corruption. The members of the Partnership Supervisory Board and Management Board shall openly and constantly declare their irreconcilable attitude to any forms of corruption and as well as demonstrate, observe and implement this principle by personal example at all levels;

3) **involvement of officials and employees** - The Partnership shall inform its officials and employees on the provisions of anti-corruption legislation and welcomes their active participation in the development and implementation of anti-corruption standards and procedures, establishment of anti-corruption culture, as well as adoption by the officials of anti-corruption restrictions stipulated by the legislation of the Republic of Kazakhstan;

4) **inevitability of punishment** - The Partnership shall declare the inevitability of punishment for the officials and employees of the Partnership, regardless the position they hold, length of service and other conditions in the event that they commit corruption offenses, corrupt actions in the performance of their official duties, as well as the failure to comply with the internal documents of the Partnership on anti-corruption enforcement, including but not limited to the Compliance officer records and memos;

5) **legality and compliance of this Policy with the applicable law and generally accepted standards** – The Partnership shall strictly comply with the anti-corruption legislation of the Republic of Kazakhstan and other countries where it is operating or intends to operate, as well as ensure that any of its actions or inactions do not contradict the applicable anti-corruption legislation;

6) **proportionality of the procedures for corruption prevention and control** – The Partnership shall develop and implement the control procedures to reduce the likelihood of involvement of the Partnership, its officials, and employees



in corrupt practices, in proportion to the corruption risks that may arise in the course of the Partnership activities;

7) **the efficiency of anti-corruption procedures** – The Partnership shall aspire to make the procedures as transparent, clear, and feasible as possible, which ensure the simplicity of implementation thereof and obtaining the significant result. The Partnership shall perform assessment of the existing control procedures efficiency and improves them in case of inefficiency;

8) **monitoring and control** – The Partnership shall monitor the corruption risks condition, control compliance with the implemented procedures for preventing corruption and anti-corruption enforcement and efficiency thereof;

9) **avoidance of the conflicts of interest** – The Partnership believes that the officials and employees of the Partnership should not directly or indirectly influence the decision-making in the Partnership in the event of a conflict of interest with the Partnership's interests;

10) **due diligence** - The Partnership shall exercise due diligence when establishing/continuing business relations with counter-agents, job candidates or other third parties, by carrying out timely verification of their credibility and absence of conflicts of interest;

11) **leadership and coordination** – The Partnership shall ensure interaction and cooperation in the sphere of anti-corruption activities with the government bodies and associated / third parties of the Partnership, as well as coordination of actions as the part of anti-corruption enforcement process;

corruption prevention - the Partnership, as well as its officials and employees take corrective measures based on the principles of zero tolerance to any manifestations of corruption, as well as study, identify, limit and eliminate the causes and conditions that contribute to the commission of corruption offenses through development and implementation of preventive measures system.

5.2 Corruption risks assessment

5.2.1. In accordance with the legislation, the Partnership conducts the internal assessment of corruption risks.

5.2.2. The purpose of identifying and assessing the corruption risks is determination of those lines of activity and business-processes of the Partnership which are subjected to the risks of non-compliance with anti-corruption legislation and where there is a high probability that officials and employees commit corruption offenses, both for personal gain and for obtainment of the benefit by the Partnership.

5.2.3. Identification and assessment of corruption risks are performed on the basis of the anti-corruption monitoring and internal analysis of corruption risks.

5.2.4. Anti-corruption monitoring includes the following measures, including but not limited to:



1) conducting the compliance expertize of the key internal documents of the Partnership and their drafts as related to availability of provisions that contribute to the establishment of reasons and conditions for the cases of corruption (factors) and development of the suggestions for their elimination;

2) monitoring of anti-corruption legislation, as well as anti-corruption legislation of foreign countries affecting the Partnership activity for the purpose of operative bringing of internal documents into compliance with the changing requirements of anti-corruption legislation;

3) study of statistics of addresses of individuals and legal entities as related to facts of manifestations of corruption on the part of officials and employees;

4) monitoring of publications in mass media.

5.2.5. The object of internal analysis of corruption risks is the Partnership activity and it includes:

1) identification of "critical points" of the business-process, during implementation of which the occurrence of corruption offenses is most likely;

2) description of corruption schemes that contain:

- characteristics of the benefit or advantage which may be obtained by the Partnership or its individual officials and employees when committing the corruption offense;

- possible forms of corruption payments;

3) determination of availability or absence of internal control procedures, assessment of efficiency of the existing control procedures.

5.2.6. For any corruption scheme, the zero level of risk tolerance is adopted and in each case the Partnership immediately develops measures to minimize the corruption risks revealed following the results of internal analysis.

5.2.7. The procedure for identifying and assessing corruption risks, developing the measures to minimize them is regulated by the legislation and internal regulatory documents of the Partnership.

5.3 Inspection of counter-agents

5.3.1. The Partnership makes reasonable efforts to minimize the risk of business relationships with counter-agents that may be involved in corrupt practices, for which the counter-agents' tolerance for bribery is checked, including checking whether they have their own anti-corruption policies or procedures, their readiness to comply with the requirements of this Policy, and include anti-corruption proviso in contracts as per the form stipulated in the Attachment No.4 to this Policy, as well as provide mutual assistance for ethical business practices and prevention of corruption.

5.3.2. The use of an anti-corruption proviso helps to maintain trust between the parties and prevent corruption, both when concluding and executing the contracts.



5.3.3. When intending to establish business relations with counter-agents, the initiator of the contract and/or other agreement shall check their reliability in accordance with the internal documents of the Partnership settling this procedure. If "risk factors" are identified, the initiator of the contract and/or other agreement should bring the information to the direct leader of the Partnership for making the relevant decision in a mandatory order.

5.4 Participation in charitable, sponsorship and political activities

5.4.1. The Partnership does not finance charitable and sponsorship projects in order to obtain or maintain the advantage in its activity.

5.4.2. The Partnership, as well as officials and employees do not finance the political parties, public associations in order to obtain or maintain the advantage in its activity.

5.4.3. When participating in public associations the officials and employees are prohibited from offering, giving, promising, or making payments, bringing in property, giving gifts, etc. on behalf of the Partnership for the purpose of obtaining or maintaining the advantage for the Partnership in its activity.

5.4.4. Officials and employees are independently responsible in accordance with the effective legislation of the Republic of Kazakhstan for participation in the public organizations.

5.5 Facilitation Payment

5.5.1. This Policy prohibits making or accepting payments as the facilitation awards. Facilitation payment means payments made to officials and employees to complete or expedite the regular procedures. Facilitation payment differs from official service fees, which are publicly available.

5.6 Giving, accepting gifts, other services (signs of attention)

5.6.1. In accordance with the legislation of the Republic of Kazakhstan and the Business Ethics Code, the Partnership prohibits officials and employees, as well as family members of these persons from receiving material remuneration, gifts or services rendered for actions (inaction) of this person in favor of persons who have provided the materials remuneration, gifts or services, if such actions (inaction) are part of the official powers of this person or, by virtue of his/her official position, he/she can contribute to such actions (inaction).

5.6.2. Gifts and money received without the knowledge of officials and/or members of their families are subject to gratuitous handing-off/transfer to the authorized state body in accordance with the requirements of the anti-corruption legislation.

5.6.3. The Partnership recognizes the exchange of business gifts (souvenirs) in the course of official meetings and the performance of representation expenses,



including the business hospitality, necessary part of keeping business and generally accepted business practice. The Partnership strongly encourages an atmosphere of honesty and transparency with respect to business gifts and expenses for business hospitality.

5.7 Performance of representation expenses, including for business hospitality of the Partnership with the third parties, should meet the following criteria:

1) fully comply with the standards of the legislation of the Republic of Kazakhstan, Business Ethics Code and internal regulatory documents of the Partnership;

2) be reasonable, proportionate and not luxury goods;

3) not represent a hidden remuneration for service, action, inaction, connivance, patronage, granting rights, making a certain decision on transaction, agreement, license, permit and etc, or the attempt to affect the recipient for another illegal or unethical purpose;

4) the exercise of hospitality is not intended and cannot be perceived as intended to influence or induce a person to act in a certain way, or to reward that person for performing his/her role or functions;

5) not create a reputational risk for the Partnership, officials and employees, as well as other persons in the event of disclosure of information about gifts or entertainment expenses;

6) the exercise of hospitality is appropriate and does not exceed the scope of this Policy and does not violate the hospitality policy of the relevant third party.

5.7.1. Any exercise of hospitality should be carried out in accordance with the legislation of the Republic of Kazakhstan and the internal regulatory documents of the Partnership.

5.7.2. It is not allowed to offer signs of hospitality and gifts to public officers, officials in the entities of the quasi-public sector and their families. It is also not allowed to offer or give gifts if it is known that accepting the gift is unacceptable for the gift recipient.

5.7.3. All expenses for business gifts and business hospitality, as well as advertising expenses should be strictly in accordance with the approved business plan of the Partnership. The budget requests of the administrators of such budget programs should be ratified in advance by the Compliance officer and the Management of the Partnership.

5.7.4. In case of doubts in the compliance of a business present or event with the requirements of this Policy, the employee should consult the Compliance officer of the Partnership on this matter.

5.7.5. The employees and officials of the Partnership when performing the job duties, avoid the giving and/or accepting the gifts and exercise of hospitality, since



such actions would unduly affect or create the appearance of such impact on employees, officials and business partners of the Partnership.

5.7.6. When entering into business relationships, the employees are recommended to familiarize business partners with this Policy. If available, to familiarize yourself with a similar internal document adopted by business partners, third parties.

5.7.7. If a gift in the form of cash or cash equivalents, as well as material values and services is received through imprudence, the employee should inform in writing the head of his/her structural subdivision or the leader supervising his/her structural subdivision (if the employee is the head of the structural subdivision) and the Compliance officer, and arrange the immediate return.

5.7.8. The employee should inform in writing the head of his/her structural subdivision or the leader supervising his/her structural subdivision (if the employee is the head of the structural subdivision) in case of accepting an act of hospitality from the third party due to imprudence:

1) treats (food expenses) in the regular course of business relations with third parties;

2) ticket, invitations (in a company with the third party) to cultural events that seem appropriate and not going beyond the usual business courtesy.

5.7.9. The Compliance officer conducts a preliminary assessment (gifts, representational expenses, acts of hospitality, etc.) for compliance with the criteria specified in sub-items 1-6) of item 5.7. of the Policy that will allow to exclude, including cases of acceptance of the act of hospitality from the third party through imprudence.

5.7.10. The actions specified in this section should be registered in the Log of gifts and acts of hospitality, which is maintained by the Compliance officer in accordance with Attachment No. 2 to this Policy.

5.7.11. The log is kept on paper, laced up and numbered in order to exclude corrections, blots and erasures.

5.8 Work with addresses of individuals and legal entities received within the established procedures

5.8.1. For the purpose of corruption prevention and anti-corruption enforcement, the Partnership carries out work with addresses of individuals and legal entities received in accordance with the requirements of the legislation of the Republic of Kazakhstan and the internal regulatory documents of the Partnership.

5.8.2. The initiative information line (hot line) operates in the Partnership According to the established procedure, in accordance with the internal regulatory documents of the Partnership for initiative information for work with messages on violations of the Business Ethics Code, including cases of corruption, fraud, discrimination and unethical behavior.



5.8.3. Consideration of addresses of individuals and legal entities received within the initiative information is carried out in accordance with the internal regulatory documents of the Partnership.

5.9 Compliance audits performance procedure

5.9.1. The compliance audit is carried out basing on the messages of corruption offenses, violations of the standards of Business Ethics Code, including appeals received through initiative information line (hot line), by the Compliance officer (with mandatory notification of General Director and First Deputy General Director).

Compliance audit in relation to General Director and/or First Deputy General Director is carried out by the decision of the Chairman of the Supervisory Board of the Partnership.

5.9.2. Compliance audit is carried out by the Compliance officer, if necessary with the involvement of representatives of the structural subdivisions of the Partnership with control functions.

5.9.3. Decision to conduct the compliance audit is made in the form of the relevant resolution of the Persons specified in the item 5.9.1. of this article on the memo of the Compliance officer or directly on the address/message on facts of corruption and violation of the Business Ethics Code.

5.9.4. In case if following the compliance audit results, the fact of corruption is established, the completion of the investigation is considered to be the taking of corrective measures, based on the principle of zero tolerance for any cases of corruption, up to termination of labor relations and transfer of materials to the relevant authorized state bodies, as well as improvement of control procedures.

5.9.5. Officials and employees are obliged to inform the Compliance officer on their suspicions or provide the information received from other persons on possible corruption actions committed by any official or employee, counterparty or other parties having any relation to the Partnership.

5.9.6. Any person who has reasonable grounds to believe that an unlawful act has been committed should not try to independently conduct an investigation, discuss the information received with other persons.

5.9.7. The Compliance officer performing the compliance audit guarantees the confidentiality of information about all officials, employees, as well as other persons (Counter-agents) who have reported on violations in good faith.

5.9.8. The Partnership reserves the right not to conduct audit on received anonymous reports of corruption, since the information received may be inaccurate, and in most cases fictitious in order to defame someone's name or activity.



5.9.9. In order to clarify the circumstances, the Compliance officer, independently or together with the concerned structural subdivisions of the Partnership, may initiate the creation of a Committee, the composition of which is approved by the Persons specified in item 5.9.1. of this article.

5.9.10. When conducting a compliance audit, potential conflicts of interests should be excluded.

5.9.11. The Compliance officer and members of the Committee, in order to carry out their functions of conducting a compliance audit, have the right for:

1) access to any information and materials necessary for the implementation of the audit, within the scope of authority and the issues assigned to them;

2) getting written explanations from the Partnership employees on the issues of the audit;

3) requesting necessary information on verification issues in the relevant structural subdivisions of the Partnership or getting their consultations;

4) in the prescribed manner, familiarizing with the documents (including confidential) related to the audit. In case of necessity, attach their copies or extracts from them to the audit materials;

5) making a proposal on bringing to responsibility of the Partnership who have committed a disciplinary offense, and/or to recover material damage caused to the Partnership;

6) attraction of internal and external specialists to perform their functions of conducting audits in the manner prescribed by internal documents;

7) for material resources, which should be sufficient and appropriate for the effective conduction of the audit;

8) submission recommendations for eliminating of the identified violations and shortcomings in the work of individual employees and structural subdivisions of the Partnership, as well as recommendations for optimizing the work of the specified structural divisions that became known during the audit to the management of the Partnership;

9) take other actions related to the implementation of their functions.


5.9.12. When conducting the compliance audit, the Compliance officer and/or members of the Committee should be guided by the principles of independence, objectivity, professional competence, impartiality and confidentiality.

5.9.13. Members of the Committee shall bear responsibility established by the Republic of Kazakhstan legislation and internal documents of the Partnership for failure to fulfill their obligations during compliance audits and/or requirements of the relevant internal documents of the Partnership.

5.9.14. Officials and employees of the Partnership should not interfere with the activities of inspectors when they conduct inspections and other compliance procedures.

5.9.15. Based on the results of the compliance audit, report drawn up which is signed by the Compliance officer and/or members of the Committee.



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5.9.16. Report is sent to the Partnership management in order to take relevant decisions.

5.9.17. In case of revealing possible facts of corruption on the part of officials and employees of the Partnership, the decision to send the audit results to the appropriate law enforcement agencies is taken by the top-management of the Partnership.

5.9.18. The Partnership has the right to provide the available materials collected during the compliance audit to the law enforcement and judicial authorities.

5.9.19. In all cases, when there is enough evidence to bring persons to disciplinary liability, the disciplinary actions are applied in compliance with the legislation of the Republic of Kazakhstan.

5.10 Responsibility

5.10.1. The officials and employees bear criminal, administrative, civil and disciplinary responsibility for committing corruption acts, corruption offenses in accordance with the legislation of the Republic of Kazakhstan.

5.10.2. The Partnership top manager bears the responsibility, stipulated by the legislation of the Republic of Kazakhstan, for failure to perform or improper performance of job duties for preventing the commitment of corruption offences by subordinate employees.

The Partnership top manager is subject to liability in the order, stipulated by applicable legislation of the Republic of Kazakhstan, for committing of corruption offences by employees directly subordinate to him under the following conditions:

1) a connection has been established between a corruption crime, committed by a subordinate and guilt on failure to perform or improper performance of job duties to prevent the commitment of corruption offenses;

2) there is a judicial act in relation to the subordinate employee on criminal liability for corruption offense or criminal offense that has entered into legal force, for committing the corruption offense has been terminated by a prosecuting agency or court on the basis of items 3), 4), 9), 10) 11) and 12) part 1 of Article 35 or Article 36 of the Criminal Procedure Code of the Republic of Kazakhstan.

5.10.3. Persons to whom appropriate measures of responsibility were applied for committing corruption offenses are not exempted from compensation for material damage to the Partnership.

5.10.4. The officials and leaders of structural subdivisions of the Partnership, within their powers, as well as leaders of the third parties - Counter-agents working on behalf of the Partnership within the scope of contractual relations, or on behalf of a higher authority (auditors, agents, consultants, and etc.), are responsible for arrangement and coordination of activities to implement the provisions established by this Policy.



5.10.5. Officials are required to confirm in writing the acceptance of anti-corruption restrictions in accordance with Attachment No.3 to this Policy.

5.10.6. Officials are liable in accordance with the legislation for non-fulfillment or improper fulfillment of the requirements provided for by anti-corruption legislation, including for non-compliance with anti-corruption restrictions.

5.10.7. Officials and employees of the Partnership in the performance of their duties shall:

- familiarize with the Policy, sign a commitment to comply with the Policy in accordance with Attachment No.1 to the Policy and submit it to HR;

- be guided by the internal documents of the Partnership for Anti-corruption enforcement, records and memos of the Compliance officer in the field of anti-corruption legislation;

- take into account the observance of the Policy when assessing business qualities of an Employee, including in the case of his/her appointment to a higher position, decision of other personnel issues;

- strictly comply with restrictions and requirements envisaged by the Policy, including those relating to the giving, receiving gifts; making representational expenses, charity and sponsorship activity; political participation; interaction with government representatives, persons falling under the Law of the Republic of Kazakhstan "On anti-corruption management", public organizations, counter-agents, intermediaries, third parties; avoidance of conflicts of interests; record-keeping.

5.10.8. Strictly comply with the express prohibition of the following actions:

- to participate in corrupt practices, including not offering, promising, giving bribes to persons falling under the Law of the Republic of Kazakhstan "On anti-corruption management";

- to ask for and receive bribes (commercial bribery);

- to participate in commercial bribery of counter-agents or by the Counter-agents of Employees/Officials of the Partnership;

- to make payments for simplification of administrative, bureaucratic and other formalities in any form, including in the form of cash or cash equivalents, valuables, services or other benefits of property and non-property nature, to any persons and from any persons or organizations, including commercial and non-commercial organizations, government agencies and local authorities, persons falling under the Law of the Republic of Kazakhstan "On anti-corruption management", in order to obtain benefits for themselves, for the Partnership or for the third parties.

5.10.9 Officials in the course of their official duties performance should strictly follow the categorical prohibition on requests and receiving bribes from the Partnership Counter-agents and other third parties; comply with anti-corruption requirements and restrictions established by other internal documents of the Partnership (in the part that does not contradict the Policy).



5.10.10. Employees of the Partnership at interaction with the Counter-agents shall establish and maintain business relations with those Counter-agents who perform business relations on the fair and honest basis, take care of their own reputation, show support for high ethical standards in the conducting economic activity, implement own measures to anti-corruption enforcement.

5.10.11. HR shall be responsible for:

1) recording in writing by officials the adoption of anti-corruption restrictions and publication of information provided for by Anti-corruption legislation;

2) control on submission of income and property declarations by candidates for positions in accordance with the Law of the Republic of Kazakhstan "On anti-corruption management" and their spouses.

5.10.12. LG and Compliance officer carry out analysis of internal regulatory documents for compliance with the RK Law "On anti-corruption management".

5.10.13. The Compliance officer is responsible for assessing corruption risks and conducting anti-corruption monitoring, as well as monitoring compliance by officials and employees of the Partnership with all other requirements of the anti-corruption legislation.

5.10.14. The initiators of contracts are responsible for inclusion of anti-corruption clause into the contracts concluded with the Counter-agents according to the form provided for in Attachment No. 4 to this Policy.

5.10.15. The Compliance officer of the Partnership is responsible for development and management of this Policy.

5.10.16. Responsibility for meeting the requirements of this Policy is assigned to the managers and employees of the Partnership.

5.11 Final provisions

5.11.1. The Compliance officer considers all issues, within his competence, accepted at the level of the Management Board, Supervisory Board and General Meeting.

5.11.2. To comply with international standards of business ethics, openness and transparency of business conduct, employees/officials of the Partnership shall notify the Compliance officer on all cases of their inclinations to commit corruption offenses, in accordance with the internal documents of the Partnership.

5.11.3. In case of doubts related to the legality of the employees/officials actions of the Partnership, as well as counter-agents, possible corruption practices and other corruption offenses, including but not limited to theft, fraud, bribery, commercial bribery, conflict of interests and others, the employee/official, counter-agent, participant or other person can in the form of an open dialogue (including anonymously) report his/her doubts to the Compliance officer.



6 DOCUMENTING

6.1. Documentation

Se q. No	Title of document	Form of document	Executor	Place of storage	Compilation/upd ating frequency
1	2	3	4	5	6
1.	"Obligation to follow the standards of the Anti-corruption enforcement policy in Beineu-Shymkent Gas Pipeline LLP"	Attachment No.1	Employees/Officials of the Partnership	HR	When concluding an Labor contract/when adopting a Policy
2.	Form of consent to accept anti-corruption restrictions and Confirmation of information reliability	Attachment No.3	Compliance officer	HR	As and when needed
3.	Form of Anti-Corruption Clause	Attachment No.4	Employees/Officials of the Partnership	Contracts of the Partnership	On regular basis

6.2. Records

Se q. No	Title of document	Form of document	Executor	Place of storage	Period of storage
1	2	3	4	5	6
1.	Form of Gifts and hospitality acts registration log	Attachment No.2	Compliance officer	Compliance officer	As and when needed

7 ATTACHMENTS

- Attachment No.1 "Obligation to follow the standards of the Anti-corruption enforcement policy in Beineu-Shymkent Gas Pipeline LLP".
- Attachment No.2 "Form of Gifts and hospitality acts registration log".
- Attachment No.3 "Form of consent to accept anti-corruption restrictions and Confirmation of information reliability".
- Attachment No.4 "Form of Anti-Corruption Clause"



Attachment No.1

Use this form to confirm that you have carefully studied, understood and agree to faithfully follow the requirements established by the Anti-corruption enforcement policy of Beineu-Shymkent Gas Pipeline LLP.

The completed and signed commitment form is filed by PK in the employee's personal file.

“Obligation to follow the standards of the Anti-corruption enforcement policy in Beineu-Shymkent Gas Pipeline LLP”.

Please mark the relevant cells

- ☐ I confirm that I have studied and understood the Anti-corruption enforcement policy of Beineu-Shymkent Gas Pipeline LLP (hereinafter - the Policy).
- ☐ I undertake to strictly follow the requirements established by the Policy, including:
 - 1) mediation of the third parties, including not offering, giving, promising, asking and receiving Bribes and payments to simplify the formal procedures in any form whatsoever (Incentive payments), including those in the form of moneys, valuables, services or other benefits to or from any people or companies, including commercial organizations, governmental or public authorities, Kazakhstan and foreign state officials, private companies and representatives thereof;
 - 2) to refrain from behavior that may be construed by others as willingness to commit or participate in the corruption offense in the interests of or on behalf of the Partnership;
 - to immediately inform the immediate leader and the person responsible for monitoring compliance with the Policy;
 - on the cases of the Employee's inclination to commit corruption offenses;
 - on the information that has become known to the Employee as related to the cases of corruption offenses committed by other Employees, the Partnership Counter-agents or other people;
 - on the possibility of occurrence of or the occurred conflict of interests with the Employee.
- ☐ I have been notified that if I violate the anti-corruption requirements of Kazakhstan and other applicable legislation, as well as the Policy, I may be brought to civil and legal, administrative and criminal liability, including dismissal from the hold position, in the procedure established by the legislative acts of the Republic of Kazakhstan.
- ☐ I am familiar with the opportunity to inform the “hotline” of the Partnership, Compliance officer on available suspicions of the legitimacy or ethics of its actions, as well as actions, inaction or proposals of other Employees, Counter-agents or other people, who interact with the Partnership.



- ☐ It has been explained to me that neither Employee of the Partnership, including myself, will become the subject to any sanctions and prosecuting by the Partnership if he (she) reported on a suspected fact of corruption, or if he (she) refused to give or receive a Bribe, commit a Commercial bribery, or to render Mediation in bribery in any other way, including the cases when as a result of such a refusal the Partnership has lost profits or has not received commercial and competitive advantages.
- ☐ It has been explained to me that if I have additional questions about the principles and requirements of the Policy and applicable anti-corruption legislation, I can contact the Compliance officer.

Please sign here

_____ “ ” _____ 20__

Full name, signature



Attachment No.2

Form of gifts and hospitality acts registration log

Seq.No.	Date of provision of hospitality act, receipt of a gift	Full name and position of the person, who submitted the notification on receipt of the gift	Gift name, description of the act of hospitality	Full name and position of the person, who received the gift	Title, Full name of the Presenter	Special notes
1	2	3	4	5	6	7




Attachment No.3

Form of consent to accept anti-corruption restrictions and confirmation of information reliability

I, _____,
(full name)

(specify the position of a person, who is an official and / or a person performing managerial functions¹)

(specify if the consent is provided by a person, who is a candidate for a position related to the aforesaid functions)

(specify the Company)

in order to comply with the requirements of the Law of the Republic of Kazakhstan "On anti-corruption management" dated November 18, 2015 No. 410-V (hereinafter - the Law), other bylaws and internal regulatory documents of Beineu-Shymkent Gas Pipeline LLP, prevention of actions that may lead to use my powers for personal, group and other non-official interests, I accept the anti-corruption restrictions provided by the Law, taking into consideration the specifics established by Articles 13, 14, 14-1 and 15 of the Law, anti-corruption restrictions on:

- 1) performance of the activity that do not comply with the performance of his/her functions;
- 2) inadmissibility of shared service (works) with close relatives, spouses and in-law relatives², including in one structural subdivision and have close relatives, a spouse and (or) in-law relatives in direct subordination, or in different subdivisions, if the position is functionally

¹ According to the Law, a person performing managerial functions in a state organization or a subject of a quasi-public sector is a person who permanently, temporarily or by special authority performs organizational-administrative or administrative-economic functions in specified organizations;

administrative and economic functions - the right to manage and dispose of property on the balance sheet of an organization granted in accordance with the procedure established by the law of the Republic of Kazakhstan;

a person equated to persons authorized to perform state functions is a person performing managerial functions in a public organization or an entity of the quasi-public sector, as well as a person authorized to make decisions on the organization and performance of purchases, including state purchases, or responsible for the selection and implementation of projects financed from the state budget and the National Fund of the Republic of Kazakhstan, holding a position not lower than the head of an independent structural subdivision in specified organizations;

² According to the Law, close relatives are understood as parents (a parent), children, adoptive parents, adopted children, full and half brothers and sisters, grandfather, grandmother, grandchildren, in-law relatives mean full and half blood brothers and sisters, parents and children of a spouse.



connected (based on business processes and procedures) with the positions held by their close relatives, spouses and in-law relatives;

3) use of service and other information that is not subject to official distribution in order to obtain or extract property and non-property benefits and advantages;

4) acceptance of financial remuneration, gifts or services for actions (inaction) in favor of the persons, who provided them, if such actions are included in the official powers of the persons specified in the first paragraph of this item, or these persons, by virtue of their official position, can contribute to such actions (inaction)³.

I undertake to strictly follow the requirements established by the anti-corruption legislation of the Republic of Kazakhstan.

I am not a person deprived of the right to hold any positions for a certain period of time by a court decision that has entered into legal force and / or brought to criminal / administrative / disciplinary liability and has a criminal record, as well as a person is made liable for committing a corruption offense.

I undertake to notify in writing the Company Management on close relatives, spouse and (or) in-law relatives working in this Company **before employment or within one working day** from the date of occurrence of such a circumstance. I have been notified that if I do not eliminate such violation voluntarily within three months from the date of identification of the specified violation, then I will be transferred to a position that excludes such subordination, and if such a transfer is impossible, then one of such employees is subject to dismissal or other exemption from specified functions.

I have been notified that if I violate the anti-corruption requirements of Kazakhstan and other applicable legislation, as well as the Policy, I may be brought to civil and legal, administrative and criminal liability, including dismissal from the hold position, in the procedure established by the legislative acts of the Republic of Kazakhstan.

I am notified that the money received into my account or the accounts of my family members without our knowledge, as well as funds received by me or them in violation of sub-item 4) of item 1 and item 5 of Article 12 of the Law, **no more than two weeks** after their detection is subject to transfer to the republican budget with the submission of an explanation to the appropriate state revenue authority on the circumstances of the receipt of such funds.

I am notified that gifts received without the knowledge of me or my family members, as well as received by me and them in violation of sub-item 4) of item 1 and item 5 of Article 12 of the Law, are subject to unpaid transfer to the authorized body for state property management **within seven calendar days** from the day of receipt of the gift or from the day, when I or we became aware of the receipt of the gift, and the services rendered to these persons under the same circumstances shall be paid by transferring monetary funds to the Republican budget **within seven calendar days** from the date of the rendering service or from the day, when the person specified in the first paragraph of item 1 of Article 12 of the Law became aware of the service rendering. At that, the person, who transferred the gift to the authorized body for state property management has the right,

³ Family members of a person are not entitled to receive financial remuneration, gifts or services provided for the actions (inaction) of this person in favor of the persons who provided financial remuneration, gifts or services, if such actions (inaction) are part of the official powers of this person or it is by virtue of his official position can contribute to such actions (inaction) (according to the Law, a person family members mean his spouse, parents, children, including full-aged children, and persons, who are dependent and permanently residing with him/her).




with the notification of the superior official, to repurchase it at the cost determined in accordance with the Law of the Republic of Kazakhstan "On appraisal activity in the Republic of Kazakhstan", on the basis of a sale and purchase contract concluded with the authorized body for the state property management. Monetary funds from the sale of gifts are transferred to the Republican budget.

I am notified that non-acceptance of anti-corruption restrictions entails refusal to hire or dismiss from the position (dismissal), their failure to comply in cases where there are no signs of a criminal act and an administrative offense is the basis for termination of labor relations.

(Position)

Full name (write in full with your own hand)

Date

Signature



Attachment No.4**Form of anti-corruption clause**

1. Beineu-Shymkent Gas Pipeline LLP (hereinafter – the Partnership) informs the other party of the Contract (hereinafter - the Counter-agent) on principles and requirements of the Anti-corruption enforcement Policy in the Partnership (hereinafter - the Policy). By signing the Contract, the Counter-agent confirms familiarization with the Policy placed on the official website of the Partnership.
2. The Counter-agent undertakes to comply with and ensure the compliance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan, as well as not to commit corruption offenses provided by international acts and legislative acts of foreign states on anti-corruption enforcement applicable for the purposes of the Contract and comply with the guarantees of this clause.
3. The Counter-agent confirms that it is not a person associated with the state, and does not have persons falling under effect of the Law of the Republic of Kazakhstan “On anti-corruption management”, who are its officials, employees or direct, indirect owners. The Counter-agent shall immediately inform the Partnership in writing on all cases when any person subject to the Law of the Republic of Kazakhstan “On anti-corruption management” becomes an official or employee of the Counter-agent or acquires a direct or indirect interest share in the company of the Counter-agent.
4. In fulfilling their obligations under this Contract, the Parties and their employees do not pay, do not propose and do not allow payment of any monetary funds or valuables directly or indirectly to any people in order to affect the actions or decisions of such people pursuing obtainment of any unlawful advantages or achieve other unlawful objectives.
5. In fulfilling their obligations under this Contract, the Parties and their employees do not perform the actions, which are qualified, by the legislation applicable for the purposes of this Contract, as giving / receiving a bribe, commercial bribery, as well as actions that violate the requirements of the applicable legislation and international acts on combating legalization (laundering) of income that has been obtained through criminal activity.
6. Either Party to this Contract refuses to stimulate, in any way whatsoever, the employees of the other Party, including through provision of monetary sums, gifts, gratuitous performance of work (services) to them and in other ways, which puts an employee into certain dependence, and is aimed at securing performance by such employee of any actions in favor of the incentive Party.
7. If the Party suspects that there was or will be the violation of any anti-corruption provisions, the relevant Party is obliged to notify other Party in writing.
8. In a written notification, the Party is obliged to refer to facts or submit the materials that reliably confirm or suggest that any provisions of these terms by the Counter-agent, its employees has or may occur, in the form qualified by applicable law, as giving or receiving a bribe, commercial bribery, as well as the actions that violate the requirements



of the applicable legislation and international acts on combating laundering of income that has been obtained through criminal activity.

9. The Counter-agent undertakes to provide assistance and support to the Partnership in good faith in the case of an actual or possible violation of the requirements of this Anti-Corruption Clause.
10. In order to report on the cases of the requirements violation, the Counter-agent is obliged to use the "Hotline" of the Partnership, the information on which is available on the official web site of the Partnership.

Note: it is allowed to make amendments and / or supplements to the form of the Anti-Corruption Clause upon the agreement of the Parties under the Contract.

A handwritten signature in blue ink, appearing to be "Chahmud", is located at the bottom right of the page. The signature is written in a cursive style with a long horizontal stroke at the end.

8 ЛИСТ СОГЛАСОВАНИЯ / COORDINATION SHEET

Должность & Подпись (виза) / Position & Signature				
Должность/Position	Director / Директор	signature, date/ подпись, дата	Deputy Director / Зам. Директора	signature, date/ подпись, дата
Internal Control and Risk Management Department / Департамент внутреннего контроля и управления рисками	Болатбеков М./ Bolatbekov M.		Омарова Ж./ Omarova Zh.	
Департамент ОТ, ТБ, ОС /HSE Department	Избергенов М. М. /Maxim Izbergenov		Хэ Минян /He Mingyang	
Департамент по управлению персоналом /Human resources Department	Копеева Б.Т./ B. Kopeyeva		Цюй Чжицян /Qu Zhiqiang	
Legal Department/ Юридический Департамент	Айталиев А.К./ Aitaliyev A.K.		Цао Лайшэн/ Cao Laisheng	



9 ЛИСТ ОЗНАКОМЛЕНИЯ/ ACKNOWLEDGEMENT SHEET

Наименование подразделения/ Name of division _____

Наименование должности/ Position	Фамилия И.О./ Full name	Дата ознакомления/ Date of acknowledgeme nt	Подпись/ Signature
1	2	3	4



10 ЛИСТ РЕГИСТРАЦИИ ИЗМЕНЕНИЙ И ДОПОЛНЕНИЙ /AMENDMENTS AND SUPPLEMENTS REGISTRATION SHEET

No./ № п/п	Номер Изменения/ Number of amendment	Номер листа /Number of page	Дата внесения изменения Дополнения/ Date of introduction of amendment/ supplement	Дата проведения проверки /Date of inspection/	Ф.И.О,Подпись ответственного лица/ Signature of responsible person/
1	2	3	4	5	6



