

APPROVED

Decision of the Supervisory Board

Beineu-Shymkent Gas Pipeline LLP

Minutes No. 2022 - 17dated October 10, 2022

RULES
for proactive informing in
Beineu-Shymkent Gas Pipeline LLP

RU-BSGP-CO-01-22**Beineu-Shymkent Gas Pipeline LLP**


Almaty

2022

Periodic inspections registration sheet

Date of inspection	Inspection results	Position of the person who performed inspection	Full name of a person, who performed inspection	Signature of a person, who performed inspection
1	2	3	4	5



	RULES for proactive informing in Beineu-Shymkent Gas Pipeline LLP		
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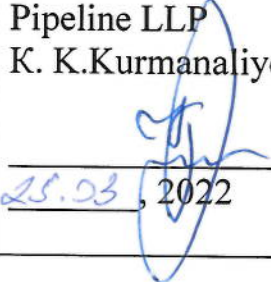
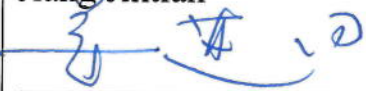
Developed: Compliance Officer Ye. Zhanguzhin  <u>25.03</u> , 2022	Agreed: First Deputy General Director Beineu-Shymkent Gas Pipeline LLP K. K. Kurmanaliyev  <u>25.03</u> , 2022	Agreed: General Director Beineu-Shymkent Gas Pipeline LLP Jiang Jintian  <u>25.03</u> , 2022
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1. PURPOSE

1.1. These Rules for proactive informing in Beineu-Shymkent Gas Pipeline LLP (hereinafter the Rules) have been developed in accordance with according to the legislation of the Republic of Kazakhstan Law on anti-corruption enforcement, internal regulatory documents supervising the activity of Beineu-Shymkent Gas Pipeline LLP (hereinafter the Partnership).

1.2. The Rules are based on the values and behavioral standards outlined in the “Business ethics code of Beineu-Shymkent Gas Pipeline LLP” and “Anti-Corruption Enforcement Policy of Beineu-Shymkent Gas Pipeline LLP”.

1.3. The provisions of the Rules are based on the principles of transparency/publicity/clarity.

2. SCOPE OF APPLICATION

2.1. The requirements of these Rules shall be applicable to all structural subdivisions, officials, associated people and employees of the Partnership (including the out-staffed personnel).

2.2 These Rules are aimed at avoidance and prevention of violations, requirements: of the legislation of the Republic of Kazakhstan Law on anti-corruption enforcement, Regulatory requirements, Business ethics code of the Partnership and other internal regulatory documents of the Partnership in the sphere of anti-corruption enforcement.

2.3. These Rules are mandatory for familiarization and application by all officials and employees of the Partnership when they take office.

2.4. In performing the functional duties and implementation of the set tasks, each official and employee of the Partnership shall be governed by the requirements set forth in these Rules.

2.5. These Rules have been developed for the first time and will be put in action upon its approval by the Partnership Supervisory Board.

3. REGULATORY REFERENCES

The references to the following regulatory documents have been applied in these Rules:

3.1.1 Law of the Republic of Kazakhstan “On anti-corruption enforcement”.

3.1.2 Law the Republic of Kazakhstan "On the limited and additional liability partnerships".



3.1.3 Manual of the Organization for Economic Co-operation and Development on Anti-corruption enforcement and bribery (OECD).

3.1.4 Charter of Beineu-Shymkent Gas Pipeline LLP

3.1.5 Code-BSGP-HR-01-16, "Business ethics code of Beineu-Shymkent Gas Pipeline LLP", approved by the decision of the Partnership Management Board July 22, 2016 (Minutes No.2016-27).

3.1.6 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).

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

3.1.8 INS-BSGP-HSE-01-20, "Instruction for formalization and structure of internal regulatory documentation of Beineu-Shymkent Gas Pipeline LLP" dated July 22, 2020 (Minutes No.2020-26).

3.1.9

4. TERMS, DEFINITIONS AND ABBREVIATIONS

4.1. Terms, definitions

These Rules operate the following terms and relevant definitions:

Associated people - organizations and other people rendering the services / performing work for the Partnership or acting on its behalf, counter-agents, legal entities and individuals who are parties to the contracts/agreements/covenants with the Partnership, suppliers, contractors, consultants rendering the services/performing the works for the Partnership or acting on behalf of the Partnership.

Hot line – a hot line created for the timely detection and prevention of violations of the legislation and/or the Business Ethics Code of the Partnership, including cases of the fraud, corruption, discrimination, unethical behavior and other violations related to the activities of the Partnership, all officials, associates and employees.

Officials - members of the Supervisory Board, members of the Management Board of the Partnership, as well as other persons of the Partnership equivalent to persons authorized for performance of the state functions in accordance with the Law of the Republic of Kazakhstan "On anti-corruption management" and the Anti-corruption enforcement policy of Beineu-Shymkent Gas Pipeline LLP.

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.



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

Ombudsman - a person appointed by the Partnership (possibly from amongst the employees) who contributes to the implementation and compliance with the business ethics principles in the Partnership.

Employee - a person who is employed by the Partnership and directly performing the work under the employment contract, as well as other people engaged under the through the agencies and the civil law contract;

Regulatory requirements - imperative norms of the valid legislation of the Republic of Kazakhstan, mandatory for execution, the requirements that are not subject to change.

The terms, applied, but not determined in these Rules, shall comply with the definitions operated in the Legislation of the Republic of Kazakhstan, Charter and other internal documents of the Partnership.

4.2 Abbreviations

The following abbreviations are used in these Rules:

IMS – integrated management system;

IRD - internal regulatory documents;

5. MAIN PART

5.1. Responsibility and powers

5.1. The Compliance Officer of the Partnership is responsible for the development and administration of these Rules.

5.2. The responsibility for meeting the requirements of these Rules shall be assigned to the leaders and employees of the Partnership.

5.2. The fundamental principles of applying the Proactive informing rules

5.2.1 The Partnership aspires after the best standards of corporate governance, transparency/publicity/clarity.

5.2.2 The Partnership is carrying out its activities basing on the values, principles and behavioral standards adopted in Business ethics code of the Partnership and keeps to zero tolerance principle in terms of bribery and corruption.

5.2.3 The zero tolerance principle to any forms of corruption means complete prohibition for the Partnership Officials, associated people and employees acting on behalf of the Partnership or in its interests, to participate directly or indirectly, personally or through any mediation in the corrupt practices regardless the business practice in this or another country.



5.2.4 The Partnership has implemented and adopted these Proactive informing rules for compliance with the requirements of the anti-corruption legislation of the Republic of Kazakhstan, regulatory requirements, the requirements of the Business Ethics Code and other internal documents of the Partnership in the sphere of anti-corruption enforcement.

Table 1 states the examples to which these Rules are applicable to.

Table 1 Examples of the appeals

Bribery and corruption, violation of business ethics (for Compliance officer)	Unequal employment and working conditions (for the Ombudsman and/or the Internal Control and Risks Management Department)
<ul style="list-style-type: none"> - illegal gratification; - fraud; - collusion; - coercion; - abuse of power; - violation of business ethics; 	<ul style="list-style-type: none"> - labor conflicts; - discrimination; - unethical behavior; - infringement of an employee rights.
Accounting irregularity (for the Internal Control and Risks Management Department)	Threat to health, safety and environment (for the Internal Control and Risks Management Department)
<ul style="list-style-type: none"> - accounting mistake; - misrepresentations in accounting; - financial omissions; - falsification of records and documents. 	<ul style="list-style-type: none"> - environmental damage; - damage to property; - unsafe working conditions; - theft; - health risks.
Information leak (for the Compliance Officer and/or Internal Control and Risks Management Department) - unauthorized disclosure of confidential and insider information	

5.3. Fundamental rules for reporting on violations/potential violations

5.3.1 Any infringement of the requirements of anti-corruption legislation of the Republic of Kazakhstan, internal regulatory documents of the Partnership in the sphere of anti-corruption enforcement, regulatory requirements, the Business Ethics Code of the Partnership may cause significant damage to the activities and reputation of the Partnership, that is why all officials, associated people and employees should be informed on the aforesaid violations.

5.3.2 Once the officials, associated people and employees become aware on non-compliance with the anti-corruption legislation, regulatory requirements, the



Business Ethics Code of the Partnership set forth in the table 1 (examples of the appeals) of the Rules, they are obliged to report on it as soon as possible.

5.3.3 The procedure for informing on the violations/potential violations has been established by these Rules.

5.3.4 The officials, associated people and employees shall ensure reliability of the provided information and bona fide nature of its disclosure. At the same time, the employee and the associated person are not required to conduct any investigation on the cases of non-compliance with anti-corruption legislation.

5.4. Reporting procedure and response actions

5.4.1 The officials, associated people and employees shall report on the violations specified in these Rules, as well as the potential violations, to:

- the leader of the structural subdivision/superior leader;
- the Compliance officer of the Partnership;
- the Internal Control and Risks Management Department;
- the Hot line;
- the Ombudsman of the Partnership.

5.4.2 Employees may contact the leader of the structural subdivision

In this case, the information is provided personally or in writing. If the information is provided in writing, it is preferable to set forth the background and chronology of the matter of concern and the reasons for such concern.

5.4.3 The employees may contact their superior leader and/or the Internal Control and Risks Management Department

If the matter under consideration is related to the immediate supervisor or if the employee prefers to discuss the issue directly with the superior leader. It is also preferable that the matter and the reasons for the concern are clearly stated in writing.

5.4.4 The immediate leader/superior leader and/or the Internal Control and Risks Management Department shall:

- receive the reports on possible violations;
- ensure that their employees are aware of these Rules and the established procedure;
- encourage the open work environment for the employees who report on violations/potential violations;
- consider the appeal in due manner, consider the necessity for conducting the investigation;
- in case of impossibility to resolve this issue within their competence in accordance with Table 1, send it to the Compliance officer of the Partnership.

5.4.5 The officials, associated people and employees may address to the Compliance officer of the Partnership



5.4.5.1 In terms of any violations outlined in these Rules, as well as the potential violations, the officials, associated people and employees may address to the Compliance officer of the Partnership using the following communication channels:

- e-mail: y.zhanguzhin@bsgp.kz;
- in writing, having specified the information in the format of the Attachment No.1 to these Rules.

5.4.5.2 The Compliance officer in turn shall:

- receive the reports on possible violations;
- determines how the investigation should be conducted, if necessary;
- performs the compliance check on the facts of violations;
- informs the person who provided information on the results of the inspection;
- interacts with the leaders of the subdivisions and top management of the Partnership in order to establish the specially created investigation committees, if necessary;
- has the right to inform the Compliance Service of the Partnership Participants on the received applications;
- submit semi-annual reports to the Partnership Management Board indicating the number of violations received in accordance with these Rules, with the brief description and result for each matter.

5.4.6 The officials, associated people and employees may call the Hot line

5.4.6.1 In terms of any violations outlined in these Rules, as well as the potential violations, the officials, associated people and employees may call the Hot line using the available communication channels posted on the official website of the Partnership.

5.4.6.2 The Hot line is functioning 24/7 daily. Telephone calls are accepted by the Operator since 09:00 until 18:00 from Monday to Friday. Information may be provided by all persons in the state, Russian and English languages.

5.4.6.3 It is critical to maintain confidentiality and anonymity of the calling person, if he/she request so, at all other times (including holidays/weekends) the telephone calls are received to the answering machine with the possibility of the requests recording. The requests received beyond the working hours shall be processed on the first working day after the request receipt.

5.4.6.4 In order to ensure confidentiality and anonymity, all received requests are accepted and processed by an external independent Operator, who transmits information on the received requests to the Compliance Officer on daily basis. For more information on the Hot line please visit the official website of the Partnership – www.bsgp.kz.

5.4.7 The officials, associated people and employees may address to the Ombudsman of the Partnership



5.4.7.1 Once the official, associated person and employee becomes aware of the violations associated with the employees' rights, it is necessary to report to the Ombudsman immediately.

5.4.7.2 The institution of the Ombudsman was established as the part of initiatives, measures and actions taken by the Participants and the Management Board of the Partnership in order to ensure compliance with the Business Ethics Code by the structural subdivisions and all Employees of the Partnership as well as to strengthen the actions on prevention and resolution of the corporate conflicts and the conflicts of interest.

5.4.7.3 The Ombudsman in return shall:

- receive the reports on possible violations;
- consider each issue presented in accordance with these Rules, the Business Ethics Code of the Partnership in due manner in accordance with the internal documents, provide explanations and consultations on the Code provisions, coordinate the work on performing investigations of the violations in accordance with the established procedure, analysis of the social discontent source;
- initiates consideration of disputes and participates in the settlement of disputes on violation of the provisions of the Business Ethics Code;
- advocates for fair and equivalent processes management during consideration of the cases and shall not serve the best interests of any Employee;
- in case of impossibility to resolve such issue, forwards it to the Compliance officer.

5.4.7.4 Violation of the Business Ethics Code causes harm to the reputation and activity of the Partnership and may entail the disciplinary sanctions and/or dismissal. At the same time, in the cases expressly provided for by the anti-corruption legislation, non-compliance with certain provisions of the Code may constitute a violation of anti-corruption legislation and entail personal administrative or criminal liability.

In this regard, the Ombudsman:

- addresses personally to all Employees of the Partnership on the issues of non-compliance with the Business Ethics Code;
- provides clarifications and interpretations of the provisions of the Business Ethics Code to the Partnership employees.

5.4.8 Preliminary verification of the allegations on the received requests

5.4.8.1 In the event that, as a result of a preliminary verification of the allegations on the received requests, the evidences of a criminal or administrative offense are traced, the verification materials shall be sent to the first leader of the Partnership for making the decision on subsequent submission of the materials to the authorized law enforcement agencies with regard to their competence in accordance with the requirements of the law.



5.4.8.2 In the event that, as a result of a preliminary verification of the allegations on the request received in terms of the first leader of the Partnership, the evidences of a criminal or administrative offense are traced, the verification materials shall be sent to the Compliance service of the Partnership Participant for considering the issue on submission of the materials to the authorized law enforcement agencies with regard to their competence in accordance with the requirements of the law.

6. DOCUMENTING

6.1. Documentation

These Rules do not require establishment of new documents.

6.2. Records

Seq. No.	Title of recording	Record form	Executor	Place of storage	Period of storage
1	2	3	4	5	6
1.	"The list of information for registering the message sent to the Compliance officer/Ombudsman/ to the Internal Control and Risks Management Department on the violations specified in these Rules, as well as potential violations."	Attachment No.1	Compliance Officer	Compliance Officer	Not limited

7. ATTACHMENTS

Attachment No.1 "The list of information for registering the message sent to the Compliance officer/Ombudsman/to the Internal Control and Risks Management Department on the violations specified in these Rules, as well as potential violations."



Attachment No.1

The list of information for registering the message sent to the Compliance officer/Ombudsman/to the Internal Control and Risks Management Department on the violations specified in these Rules, as well as potential violations.

1. Contact details *((to be indicated at the discretion of the official/associated person/employee))*:
 - full name;
 - Applicant's status *(official/employee/ associated person/counter agent etc.)*
 - contact information *(phone number, e-mail address)*.
2. Message subject *(e.g. corruption, bribery, fraud, conflict of interest)*.
3. Notice of violation and details *(what, when, where and how the described offense or planned offense occurred, who committed the violation, how this violation is related to the Partnership, as well as any other information necessary for the consideration of the report)*.
4. Additional questions:
 - Would you like us to contact you? *(If yes, please provide contact details)*;
 - Would you like to receive the information on the results of your message consideration?
 - Will you be able to provide the documents or other materials confirming the evidences stated in the violation report?



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
Департамент внутреннего контроля и управления рисками /Internal Control and Risk Management Department	Болатбеков М./ Bolatbekov M.		Омарова Ж./ Omarova Zh.	
Департамент ОТ, ТБ, ОС /HSE Department	Избергенов М. М. /Maxim Izbergenov		Хэ Минянь /He Mingyang	
Юридический Департамент/ Legal Department	Айталиев А.К./ Aitaliyev A.K.		Цао Лайшэн/ Cao Laisheng	



9. ЛИСТ ОЗНАКОМЛЕНИЯ/ ACKNOWLEDGEMENT SHEET

Наименование подразделения/ Name of subdivision _____

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



10/10/2019

11. ЛИСТ УЧЕТА КОПИЙ ДОКУМЕНТА/COPIES REGISTRATION SHEET

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