

Anti-Corruption Standards for KazMunaiGas Exploration & Production

1. These Anti-Corruption Standards for KazMunaiGas Exploration & Production (“Company”) have been designed under Article 10 of the Kazakh Bribery Act, Anti-Corruption Policy of the Company, and are aimed at creating the atmosphere of intolerance towards any form of corruption among employees by establishing a set of value-based and moral guidelines.

2. The designer of the anti-corruption standards is KazMunaiGas Exploration & Production.

3. The Anti-Corruption Standards are designed to establish a set of recommendations to prevent corruption.

4. Company’s employees should:

4.1. While exercising their rights and legitimate interests:

- fight any form of corruption; prevent violation or any act associated with or conducive to corruption; suppress any corruption offense;

- after obtaining reliable information about a corruption offense, take any steps required to prevent the offense;

- create a legal culture that is based on the principles of legality, fairness, incorruptibility, and transparency while performing their job duties;

- when publicly charged with corruption without merit, within a month from the date it became known of such charge, take legal actions to deny it.

4.2. When making a managerial or any other decision, as part of their remit: лицами своих прав и законных интересов. В случае выявления таких фактов принимать все предусмотренные законом меры по их устранению;

- prevent administrative or any other obstacles that would make it difficult for an individual or legal entity to exercise their rights and legitimate interests. If any such obstacle has been identified, take legal actions to remove those obstacles;

- use every opportunity to prevent economic damage to the Company; prevent any inspection for personal advantage or to the advantage of a third party;

- not to make use of their official powers or associated authority to derive a personal property or non-property benefit;

- take steps required to prevent a conflict of interest.

If there is a conflict of interest, take steps to prevent or resolve it under Kazakh laws or Company’s internal documents.

4.3. When drafting internal documents:

- not to use in internal documents provisions that contain corruptogenic factors or their signs that are conducive to illegal actions or any other wrongful act

by an employee, and make sure, if need be, that those provisions contain preventive measures.

4.4. In any other relationship arising out of performing their job duties:

4.4.1 Executives in their relationship with subordinates are recommended:

- through their actions to serve as a model for impartiality, fairness, unselfishness, honesty, and incorruptibility;

- to ensure that the principles of meritocracy are observed when solving a human relations issue; not to favor someone because of their kinship, fraternity or loyalty;

- to demonstrate fairness and impartiality when assessing their performance, and when incentivizing or penalizing an employee;

- not to abuse their powers so as to exercise influence on their performance when solving non-official matters;

- not to induce anyone to commit a wrongful act or any other act incompatible with agreed moral and ethical standards.

4.4.2. Subordinates in their relationship with executives should:

- only provide unbiased and reliable information when implementing an instructions immediately inform the management about any corruption offense they come to know of committed by another employee, counterparty or any other person;

- prevent personal loyalty to the management, and intention to gain any benefit or advantage by using their official powers.

5. Employees of the Company are recommended to observe the limitations set by Kazakh laws on:

- doing business that is restricted by Kazakh laws;

- employment together with a relative, spouse or relatives in-law or by marriage;

- the use of restricted or any other information that must not be disclosed to derive a property or non-property benefit;

- acceptance of gifts for discharging their job duties under Kazakh laws.