



MEMO on anti-corruption issues for candidates for positions and employees of QazAvtoJol NC JSC

Persons who are candidates for positions,

- ✓ whose duties include permanent, temporary, or specially authorized execution of organizational-administrative¹ or administrative-economic functions²;
- ✓ whose duties include decision-making related to organizing and conducting procurements;
- ✓ Heads of independent structural divisions, are **OBLIGED**:
- Provide QazAvtoJol NC JSC (hereinafter – the Company) with a declaration of assets and liabilities for themselves and their spouse before the appointment order is issued;
- Notify in writing about close relatives, spouse and/or in-laws working in the Company³.

Persons who permanently, temporarily, or by special authorization perform organizational-administrative or administrative-economic functions in the Company;

Persons authorized in the Company to make decisions on organizing and conducting procurements
HAS PROHIBITED FROM (ANTI-CORRUPTION RESTRICTIONS):

- Holding positions that are directly subordinate to positions occupied by their close relatives, spouse and/or in-laws, or having such persons in direct subordination.
- Holding positions simultaneously with their close relatives, spouse and/or in-laws in the Board of Directors or the Management Board of the Company.
- Performing official duties in the presence of a conflict of interest.
- Using official or other non-public information for obtaining material or non-material benefits.
- Accepting material rewards, gifts or services for actions (inaction) in favor of the providers, if such actions are within their official powers or they may influence such actions (inaction);
- Participating in gambling or betting in gaming establishments defined under the Law of the Republic of Kazakhstan 'On Gambling Business', as well as participating in gambling or betting in unauthorized locations or through telecommunications networks, including the Internet;
- Independently participating in the management of a business entity if such management is not part of their official duties under Kazakhstani law, or assisting in satisfying material interests of organizations or individuals by unlawfully using official powers to obtain material or other benefits;
- Engaging in entrepreneurial activity, except for acquiring and/or selling shares of open or interval unit investment funds, bonds on the organized securities market, and shares of

¹ organizational and administrative functions - the right, granted in the manner prescribed by the law of the Republic of Kazakhstan, to issue orders and instructions that are binding for the subordinates in the service, as well as to apply incentives and disciplinary sanctions in relation to the subordinates

² administrative and economic functions - the right to manage and dispose the property which is on the balance sheet of the organization, granted in the manner established by the law of the Republic of Kazakhstan

³ close relatives refer to parents (parent), children, adoptive parents (adopters), adopted, full and half brothers and sisters, grandfather, grandmother, grandchildren, in- in-laws refer to full and half brothers and sisters, parents and children of spouse

commercial organizations (common shares not exceeding 5% of the total voting shares) on the organized securities market;

- Engaging in other paid activities, except for teaching, scientific and other creative activities, or military service in the reserve.

Persons who permanently, temporarily, or by special authorization perform organizational-administrative or administrative-economic functions in the Company;

Persons authorized to make decisions on organizing and conducting procurements in the Company, **HAVE THE RIGHT:**

- To hold paid positions in the management bodies, supervisory boards, or executive bodies of subsidiaries, affiliates, and other legal entities affiliated with them in accordance with the laws of the Republic of Kazakhstan.

Persons who permanently, temporarily, or by special authorization perform organizational-administrative or administrative-economic functions in the Company;

Persons authorized to make decisions on organizing and conducting procurements in the Company are **OBLIGED:**

- Take measures to prevent and resolve conflicts of interest;
- Notify their immediate supervisor or management in writing about any arising or potential conflicts of interest as soon as they become aware of them;
- Submit the information required by the legislation of the Republic of Kazakhstan to the state revenue authorities at their place of residence.

Immediate supervisors or officials⁴, who receive information about an existing or potential conflict of interest, or information from other sources, are **OBLIGED** take timely measures to prevent and resolve the conflict of interest.

The Company strictly excludes all forms of bribery and corruption and adheres to the principles of fair competition.

ALL EMPLOYEES of the Company are **OBLIGED:**

- Immediately report any acts or signs of corruption, or violations of ethics, to the management, the Anti-Corruption Compliance Service, or the Ombudsman;
- Participate in fostering an atmosphere of zero tolerance toward corruption;
- Comply with and observe business ethics norms;
- Assist persons conducting preliminary reviews and/or internal investigations by timely providing requested materials or access to premises/objects.

The Company strictly prohibits retaliatory measures in response to employees' reports of actual or potential violations.

A person who reports a corruption offense has protected by the state and encouraged in accordance with the procedure established by the Government of the Republic of Kazakhstan.

However, a person who knowingly provides false information about a corruption offense has be held liable in accordance with the legislation of the Republic of Kazakhstan.

⁴ Members of the board of directors and the management board