

Anti-corruption Standards of TenizService Limited Liability Partnership

These anti-corruption standards (hereinafter – Standards) have been developed according to Clause 10 of the Law to Counter Corruption of the Republic of Kazakhstan, recommendations on the development of anti-corruption standards and are intended to create environment of intolerance to any actions of corruption among employees of TenizService LLP (hereinafter – Partnership) by establishing values and moral based system.

General provisions of standards.

2.1. The following are recommendations to the employees of the Partnership when exercising their rights and interests:

- counter any actions of corruption, impede violations or actions related to corruption or those creating environment for corruption, disrupt any corruption related violations;
- based on the verifiable information on the corruption violation, take any actions required to prevent or stop such violation;
- create legal awareness based on the principles of compliance with laws, honesty, incorruptibility and transparency when performing job duties;
- in case of unsubstantial public accusations of corruption, take all measures provided by the law to disprove it within a month's period;
- perform job duties in strict compliance with internal acts, policies, provisions, standards and other documents regulating internal activities of the Partnership.

2.2. When elaborating and making managerial decisions within one's competence:

- one's actions and decisions shall not cause administrative or other obstructions hindering individuals and legal entities to exercise their rights and legal interests.
- do not use official powers and deriving authority to gain material and non-material profit;
- take measures to avoid conflict of interests.

In case of a conflict of interests, take measures to avoid and clear thereof in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Partnership.

2.3. For other relations arising when fulfilling one's duties.

- Analyze and review internal documents to be implemented to identify corruption factors creating environment for the employees to take actions contrary to the law of corruption or illegal nature, and update them to include relevant preventive measures.

2.3.1. Managerial staff when dealing with subordinate staff shall:

- set an example of impartiality, fairness, disinterest, honesty and incorruptibility;
- ensure compliance with the principles of meritocracy, when resolving human resources related issues do not give preference based on kinship, compatriotism and personal attachment;
- demonstrate fairness and impartiality when evaluating results of their work and taking remunerations and disciplinary measures;
- do not use official status to influence their work when resolving non-job related issues;
- do not compel to perform actions contrary to the law as well as the actions contradictory to generally accepted moral and ethical norms.

2.3.2. Recommendations for the subordinate staff when engaging with the managerial staff are as follows:

- when performing assignments provide only unbiased and true findings, immediately inform management of corruption actions of other employees, contractors or other entities associated with the activities of the Partnership, which become known to them;
- avoid demonstrating personal loyalty to the management, striving to gain benefits and advantages owing to their official powers.

2.4. Employees of the Partnership shall comply with the restrictions and prohibitions as prescribed by the laws of the Republic of Kazakhstan related to:

- acting contrary to the acting laws of the Republic of Kazakhstan;
- using proprietary and other information not intended for public use to gain or obtain material and non-material benefits and advantages;
- accepting gifts related to performance of job duties according to the legislations of the Republic of Kazakhstan.