Approved by the General Meeting of Participants TenizService LLP dated December 27, 2010 Minutes No. 9/2010

Code of Conduct of TenizService LLP

1. General provisions

Code of Conduct (hereinafter – Code) of TenizService LLP (hereinafter – Partnership) sets up ethical norms of the Partnership activities and its employees to ensure trust to honesty, openness and professionalism of the employees of the Partnership.

The Code establishes ethical norms of relations within the Partnership. The Code based activities of the Partnership are aimed to bring value to the society in general and each employee individually.

The employees voluntarily accept ethical norms of the Code.

2. Purpose of the Code

- Maintenance and strengthening reputation of the Partnership;
- Compliance with the requirements of the Integrated Management System;

3. The key values of the Partnership are as follows:

- respect of human rights;
- professionalism of the employees of the Partnership;
- trust based relations and high cultural and moral characteristics of the employees of the Partnership;
- responsible and rational use of subsoil areas (blocks), provided to the Partnership according to the subsurface use laws of the Republic of Kazakhstan;
- assets of the Partnership;
- social responsibility for the Partnership's activities;
- development of competition advantages of each type of work;
- sustainable development of the Partnership;
- positioning of the Partnership as a company focused on development, implementation and use of high-end technologies;
- historical succession and high corporate solidarity.

4. The Partnership follows the following ethical principles:

- respect and compliance with the laws of the Republic of Kazakhstan and other countries when implementing project and business development;
- respect of human rights;
- honest, fair and responsible conduct of business;
- creating mutual benefit in the relations with the participants of business activities;
- creating and stimulating trust to the Company as an honest and stable partner;
- demonstrating trust towards the society and environment.

5. Ethical norms of relations with the Partnership

- as the highest priority compliance with environmental and public safety requirements at the production facilities;
- Implementing active social policy and social programs covering company employees and families of their families;
- providing support to non-governmental associations, culture and education organizations;

 rendering attention and help to the veterans of the Great Patriotic War, labor veterans, honored employees of the Partnership, disabled workers and families of those suffered at work.

6. Ethical norms of relations with media

- providing media only with accurate data;
- commitment to publish links to information sources.

7. Ethical norms for conflict of interests

- avoiding any conflict of interests, including those cases that involve close relatives;
- in case conflict of interests arise, inform management on such situation, select and implement actions to avoid or resolve conflict of interests, including refusal to perform job functions or its transfer to other concerned party.

8. Ethical norms for the image of the Partnership

assist and actively participate in strengthening the positive image of the Partnership.

9. Ethical norms of relations

(a) among colleagues:

- provision of accurate and true information; development of personal accountability and honesty; openness and tact when communicating;
- exactingness towards work;
- focus on facts;
- mentorship, help to young specialists and newly hired staff to develop professionally;
- avoiding conflicts if any and timely resolving thereof.

(b) between managerial staff and subordinate staff:

- ambition for professional development and encouraging initiatives of subordinate employees,
 providing them with the support in implementing innovations;
- fair moral and material remuneration; tact and politeness when communicating;
- openness to constructive critique, respect of opinion of colleagues and subordinate staff;
- tendency to create trust-based relations with subordinate staff, striving to see them as piers;
- striving to create team with strong moral;
- acknowledging dignity and integrity of a person;
- avoiding diminishing status of a company employee under no circumstance;
- resolving human resources issues exclusively based on fair requirements and transparent principles;
- use of powers exclusively within the framework of job functions.

(c) between company employees and other companies (individuals):

- respect of legal rights of third parties and individuals;
- maintenance of high moral principles of interaction to maintain and increase public trust to the activities of the Partnership;
- resolving disputes exclusively on the legal basis;
- active position when countering professional misconduct.

10. Ethical norms for handling information related to the activities of the Partnership

- confidentiality of any information except for the publicly available information; non-disclosure thereof, including to other employees who do not need it to perform their job duties;
- transfer of confidential information available to one department to other department only upon approval of the management;
- compliance with the provisions of the written commercial information non-disclosure obligation;
- transfer of information in any form to the media representatives only upon approval of the management or supervising structural subdivision responsible for cooperation with the media;

- implementation of relevant measures to ensure information security and confidentiality guarantee, which become available to them in the course of performing their job functions;
- lack of strive to get access to information the use of which is not provided for in the course of performing job duties.

11. Ethical norms for using resources

 rational management and use of the trusted assets, financial funds, appliances, communication means, software and other resources of the Partnership exclusively for work-related purposes.

12. Ethical norms for gifts and services

 it is allowed to accept gifts and services complying with the acknowledge business practice not violating effective laws and/or ethical norms.

13. Ethical norms for the activities of the employees outside the Partnership

- employees of the Partnership can operate business outside of work hours, if such activities do not harm image or material interests of the Partnership;
- employees can be engaged in politics according to their views and beliefs exclusively outside of work hours, not using resources of the Partnership;
- the Partnership does not limit personal freedom of its employees and does not regulate their private life; every employee is entitled to own way of living if this does not hinder effectiveness of his/her work and does not affect the image of the Partnership.

14. Ethical norms for the personal appearance and speech of the employees of the Partnership

- smart personal appearance and business style in clothes and shoes supporting respectable and professional image of the Partnership;
- literate speech and writing without vulgarisms and slang;
- polite manner of speaking avoiding raising voice;
- avoiding liberties when communicating with third parties, colleagues, subordinate staff, and managerial staff.