



Director of the MONT-TRADE LLP

Ye. A. Dvoryanova



Official seal is applied: / Republic of
Kazakhstan, Almaty, Mont Trade Limited
Liability Partnership/

Anti-corruption regulations

1. PURPOSE OF THE DOCUMENT, GENERAL PROVISIONS

1.1. These Regulations “On Anti-Corruption Policy” (hereinafter referred to as the “Regulations”) are designed to protect the rights and freedoms of citizens, ensure the rule of law, law enforcement and public safety and are a local Company document that defines the key principles and requirements aimed at preventing corruption and compliance with applicable anti-corruption laws, management, employees and other persons who may act on behalf of the Company.

1.2. The Regulation is designed in accordance with the Law of the Republic of Kazakhstan No. 410-T dated November 18, 2015 “On Counteracting Corruption”.

1.3. The Company’s anti-corruption measures are aimed at:

- corruption prevention, including the identification and subsequent elimination of the causes of corruption (prevention of corruption);
- detection, prevention, suppression, detection and investigation of corruption detection, prevention, suppression, detection and investigation of corruption offences (anti-corruption);
- minimizing and/or eliminating the consequences of corruption offences.

2. BASIC CONCEPTS USED IN THE REGULATIONS

2.1 For the purposes of this provision, the following basic concepts shall be used:

Corruption - the acceptance in their own interests or in the interests of others, personally or through intermediaries, of property benefits and the obtaining of advantages by persons working for the Company, using their official powers and related opportunities, as well as bribing these persons by illegally providing them with these benefits and advantages by individuals and legal entities;

Anti-corruption policy - the Company’s activities aimed at creating an effective anti-corruption system;

A corruption offence is an act that has the characteristics of corruption, for which a normative legal act establishes civil, disciplinary, administrative or criminal liability;

A corruptogenic factor is a phenomenon or a set of phenomena that generates or contributes to corruption offenses;

Corruption prevention is the Company's anti-corruption policy aimed at identifying, studying, limiting or eliminating the phenomena that give rise to corruption offenses or contribute to their spread;

Conflict of Interest - a situation in which the personal interest (direct or indirect) of an employee of the Company affects or may affect the proper performance of his or her job duties and in which a conflict arises or may arise between the personal interest of an employee and the rights and lawful interests of citizens, organizations, society or the state, which may result in harm to the rights and lawful interests of citizens, organizations, society or the state.

Personal interest of the employee - the possibility of obtaining by the employee in the performance of official duties income in the form of money, valuables, other property or property services, other property rights for themselves or for third parties.

Employees (employees) of the organization - individuals who are in labor relations with the organization on the basis of an employment contract.

Notification - notification of an employee of the organization about the appeal to him/her in order to induce him/her to commit corruption offenses

2. OBJECTIVES OF THE PROVISION

3.1. The Regulations reflect the commitment of the Company and its management to high ethical standards and the principles of open communication of information about the services provided, the work performed and the tariffs set for the organization, as well as the Company's desire to improve its corporate culture, to follow best corporate governance practices and to maintain the business reputation of the organization at the appropriate level.

3.2. The Company sets objectives for itself as follows:

- minimize the risk of involvement of the management and employees (employees) of organization regardless of their position in corrupt activities;
- summarize and explain the main requirements of anti-corruption legislation of the Republic of Kazakhstan, which can be applied to the Company and employees;
- make it incumbent upon employees to know and comply with the principles and requirements of these Regulations, the key provisions of applicable anti-corruption laws, and adequate measures to prevent corruption.

3. PRINCIPLES OF REGULATIONS

4.1. All employees of the Company shall be guided by these Regulations and strictly comply with its principles and requirements.

4.2 The Director of the Company is responsible for organizing all activities aimed at implementation of the principles and requirements of these Regulations, including the appointment of persons responsible for the development of anti-corruption measures, their implementation and control.

4.3. The principles and requirements of these Regulations apply to the Company's counterparties and representatives and to other individuals in those cases where the appropriate set forth in contracts with them, in their internal documents, or directly derived from the law.

4.4. The Company's director sets an ethical standard for zero tolerance of any form or manifestation of corruption by setting an example with his conduct and making anti-corruption policies known to all employees and counterparties.

4.5 In creating a system of anti-corruption measures, the Company is based on the following key anti-corruption principles:

4.5.1 The principle of compliance of the organization's work with applicable law and generally accepted norms. Compliance of the implemented anti-corruption measures with the Constitution of the Republic of Kazakhstan, the legislation of the Republic of Kazakhstan and other normative legal acts applicable to the enterprise.

4.5.2 The principle of personal leadership example. The key role of the organization's management in creating a culture of intolerance to corruption and in creating an internal system for preventing and countering corruption.

4.5.3 The principle of employee involvement. Awareness of the employees of the organization of the provisions of anti-corruption legislation and their active participation in formation and implementation of anti-corruption standards and procedures.

4.5.4 The principle of proportionality of anti-corruption procedures to the risk of corruption. Development and implementation of a set of measures to reduce the probability of involvement of the organization, its Head and employees in corrupt activities is carried out taking into account corruption risks existing in the activities of the organization.

4.5.5 Principle of Effectiveness of Anti-Corruption Procedures. Application at the enterprise anti-corruption measures that have low cost, ensure easy implementation and bring a significant result.

4.5.6 Principle of liability and inevitability of punishment. Inevitability of punishment for all employees of the organization regardless of their position, seniority and in cases of corruption in connection with their own duties of work and their owners of employment, as well as the personal responsibility of the organization's management for the implementation of the organization's internal anticorruption policy.

4.5.7 The principle of permanent control and regular monitoring. Regular control over the effectiveness of implemented anti-corruption standards and procedures and monitoring of their implementation.

4. ANTI-CORRUPTION LAWS

5.1. The Company, including all employees, shall comply with the norms of the Kazakhstan anticorruption legislation established, among others, by the Criminal Code of the Republic of Kazakhstan, the Code of Administrative Offences, the Law of the Republic of Kazakhstan No. 410-U dated November 18, 2015 "On Combating Corruption", these Regulations and other regulatory acts, the main requirements of which are a ban on giving bribes, a ban on taking bribes, a ban on commercial bribery and a ban on mediation in bribery.

5.2. Subject to the foregoing, all employees of the Company are strictly prohibited, directly or indirectly, personally or through the mediation of third parties, to engage in corrupt practices, offer, give, promise, solicit and receive bribes or make payments to simplify administrative, bureaucratic and other formalities in any form, in including, in the form of money, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, government and self-government bodies, government officials, private companies and their representatives.

6. EXCHANGE OF BUSINESS GIFTS AND TOKENS OF BUSINESS HOSPITALITY. HOSPITALITY EXPENSES.

6.1. Business gifts to be given and signs of business hospitality shall as follow:

- comply with the requirements of anti-corruption legislation of the Republic of the Republic of Kazakhstan, local normative acts of the organization, these Regulations.
- should be delivered and rendered only on behalf of the organization.
- should be directly related to the legitimate objectives of the Company or public holidays (New Year, March 8, Defender of the Fatherland Day, etc.) and applicable in accordance with the financial condition of the organization;
- should be reasonable, proportionate and should not a luxury. The cost of the gift may not exceed 10 MCI;
- should be purchased in agreement with the director of the Company;
- should not constitute a covert reward for a service, action, omission, connivance, patronage, granting of rights, making a particular decision on a transaction, agreement, authorization, etc. or an attempt to influence the recipient the recipient for another unlawful or unethical purpose;

6.2.

Business gifts to be given and tokens of business hospitality shall not:

- create obligations for the recipient related to his or her official position or to perform his/her official (job) duties;
- constitute a covert reward for a service, act or omission, connivance or patronage, the granting of rights or certain decisions, or an attempt to influence the recipient for another unlawful or unethical purpose;
- be in the form of cash, non-cash funds, securities, precious metals;
- create a reputational risk for the Company, its employees or others by disclosure of information about gifts or entertainment expenses;
- should not be given or received from government officials or representatives of the government, politicians or political parties.

6.3. Employees of the Company may receive business gifts, tokens of business of business hospitality only at official events, if it does not contradict the requirements of the anti-corruption legislation of the Republic of Kazakhstan, these Regulations, local normative acts of the organization.

6.4. Upon receipt of a business gift or tokens of business hospitality, an employee of the organization shall take measures to prevent the possibility of a conflict of interest in accordance with these Regulations and other local normative acts of the organization.

6.5. In the event of a conflict of interest or the possibility of a conflict of interest when receiving a

business gift or hospitality, an employee of the organization shall notify in writing the structural unit or an official of the organization responsible for combating corruption, in accordance with the procedure for disclosing conflicts of interest.

6.6. Employees of the organization are prohibited:

- to accept offers from organizations or third parties to give business gifts and business hospitality, business gifts and business hospitality in the course of business negotiations, during the conclusion of contracts, as well as in other cases where such actions may affect or create the impression of their influence on the decisions made;
- to ask, request, compel or force organizations or third parties to give them or their or their relatives to provide them or their relatives with business gifts and/or business courtesies. hospitality;
- to accept gifts in the form of cash, non-cash funds, securities precious metals.

6.7. Работник организации, получивший деловой подарок, не соответствующий п.6.1, п.6.2 настоящего Положения, обязан сообщить об этом и сдать деловой подарок своему руководителю.

6.7 An employee of the organization who has received a business gift that does not comply with clauses 6.1, 6.2 of these Regulations shall report it and return the business gift to his supervisor.

5. PARTICIPATION IN CHARITY EVENTS AND SPONSORSHIP ACTIVITIES

5.1. The Company may decide to participate in charitable events and sponsorship activities in proportion to the financial condition of the of the organization. In this case, the budget and plan for participation in the event and activities agreed with the director of the Company.

6. INTERACTION WITH PUBLIC OFFICIALS

8.1. The Company shall not, directly or through its employees, pay any expenses (gratuities, loans, services, entertainment, recreation, transport or other remuneration) for public servants and their close family members (or for their benefit) for the purpose of obtaining or retaining close relatives (or for their benefit) in order to obtain or retain advantage for the organization in its commercial activities.

8.2. Employees of the organization independently bear responsibility for corrupt practices in independent interaction with civil servants in accordance with the current legislation of the Republic of Kazakhstan. in accordance with the current legislation of the Republic of Kazakhstan.

7. INTERACTION BETWEEN EMPLOYEES

9.1. The Company requires its employees to comply with these Regulations by informing them of the key principles, requirements and penalties for violations.

9.2. The Company organizes safe, confidential and accessible means of informing the management of

the organization (a written statement to the head or the person responsible for compliance with the anti-corruption policy or a personal appeal; telephone or facsimile messages; e-mail) about the facts of bribery by persons rendering services in the interests of or on behalf of a commercial organization or on its behalf. The director may receive proposals on anti-corruption measures and controls, as well as requests from employees and third parties.

9.3. In order to develop an appropriate level of anti-corruption culture, the new employees are given induction training on these Regulations and related documents, and periodic informational events are held for current employees.

9.4. The Company has the following employee responsibilities related to preventing and combating corruption:

- refrain from committing and/or participating in the commission of corruption offenses for or on behalf of the organization;
- refrain from behavior that could be interpreted by others as a willingness to commit or participate in the commission of a corruption offense for or on behalf of the organization;
- immediately inform their direct supervisor/the person responsible for compliance with the anti-corruption policy/the Company's management if an employee is induced to commit a corruption offense;
- immediately inform their direct supervisor/the person responsible for compliance with the anti-corruption policy/the Company's management of any information the employee has become aware of about corruption offenses committed by other employees, contractors of the organization or other persons;
- notify the immediate supervisor or other responsible person of a possible or existing conflict of interest for the employee.

9.5. If an employee of the organization is approached in order to induce him/her to commit a corruption offence, he/she must immediately notify the employer orally. Within one working day, an employee of the organization shall notify the employer in writing.

If it is impossible to send a notice within the specified period (in the case of illness, Business trip, vacation, etc.) the employee of the organization sends the employer notice within one working day after arrival at the workplace.

9.6. The notice shall contain the following information:

- Name, first name, patronymic of the notifier, telephone number, and other information that the notifier believes will help establish contact with the notifier;
- the position held;
- the circumstances under which the request to induce him or her to commit corruption offences;
- known information about the person (individual or legal entity) who made an appeal to inducement to

commit a corruption offence;

- statement of the nature of the appeal (date and place of the appeal, what action (inaction) is being induced, the benefit offered, the intended consequences, and other circumstances of the appeal);

- Information about the persons involved in the case and witnesses, if any;

- Information on informing the prosecutor's office or other state bodies about the application for inducement to commit corruption offences (if any);

- Other known information of interest for the proceedings on the merits; the signature of the notifier;

- date of the notice.

9.7. The employer considers the notice and passes it to a structural subdivision or an official responsible for combating corruption in the organization, for registration in the journal of registration and accounting of notifications about the facts of treatment to induce employees to commit corruption offenses (hereinafter - the magazine) (Annex to these Regulations) on the day of receipt of the notice.

Anonymous notifications shall be handed over to the structural subdivision or the official responsible for combating corruption in the organization for information.

Anonymous notifications shall be registered in the journal, but shall not be accepted for consideration.

9.8. The information contained in the notice shall be verified within fifteen working days from the date of registration of the notice.

9.9. In order to organize the inspection, the employer within three working days establishes a commission to verify the fact of application to induce an employee of the organization to commit corruption offenses (hereinafter - the Commission).

9.10. The personal commission (chairman, deputy chairman, members and Secretary of the Commission) is appointed by the employer and approved by the legal act organization.

9.11. During the inspection the following shall be established:

- The reasons and conditions which contributed to the person's addressing the organization's employee with the purpose of inducing him/her to commit corruption offences;

- actions (inaction) of the employee of the organization, to the illegal performance of which he was tried to induce.

9.12. The commission presents the results of the inspection to the employer in the form of a written report within three days of the end of the inspection.

The conclusion shall contain:

- the composition of the commission;

- the terms of the inspection;

- the notifier and the circumstances that served as the basis for the audit;
- Confirmation (or denial) of the fact that served as the basis for the notification;
- the reasons and circumstances that contributed to the appeal to induce an employee of the organization to commit corruption offenses.

9.13. In the case of confirmation of the fact of application to induce an employee of the organization to commit a corruption offence, the commission makes recommendations to the employer on the application of measures to prevent corruption offenses. The employer decides to transfer the information to the prosecutor's office.

9.14. If the fact of applying for the purpose of inducing an employee of the organization to commit corruption offenses was not confirmed, but during the audit, signs of violations of the requirements for official conduct or a conflict of interest were revealed, the materials collected during the audit, as well as the conclusion, are sent for consideration at a meeting of the public (supervisory, trustee) board (if any) and the adoption of an appropriate decision, and are also submitted to the employer for a decision on the application of a disciplinary sanction within two working days after the completion of the audit.

10. INTERACTION WITH INTERMEDIARIES AND OTHER PERSONS, CHECKING COUNTERPARTIES

10.1. The Company selects contractors to provide work and services to it on the basis of based on the principles of:

- equality, fairness, absence of discrimination and unreasonable restrictions no unreasonable restrictions of competition in relation to the counterparties;
- fair and reasonable choice of the most preferable offers
- targeted and economically efficient expenditure of funds for the purchase of goods, works, services (taking into account, if necessary, the life cycle cost of purchased goods, works and services) and implementation of measures aimed at reducing costs organization;
- prevention of corrupt practices, conflicts of interest and other preventing corruption, conflicts of interest, and abuse of authority.

10.2. The Company seeks to establish business relationships with counterparties, supporting the requirements of anti-corruption laws and/or counterparties that declare their rejection of corruption.

10.3 The Company declares that it refuses to incentivize in any way the employees of counterparties, including by giving money, gifts, gratuitous performance of work (services) and other ways not mentioned here, which put the counterparty's employee in a certain dependence and aimed at ensuring that the employee performs any actions for the benefit of the organization.

11. AWARENESS AND TRAINING

11.1. The Company makes this Policy available on its official website, declares its rejection of corruption, and welcomes and encourages compliance with the principles and requirements of this Policy by all counterparties, its employees and other persons.

11.2. The Company promotes an anti-corruption culture by informing and systematically training employees in order to keep them of the company's anti-corruption policy and help them learn the methods and techniques of applying the anti-corruption policy in practice.

12. ANTI-CORRUPTION MEASURES

12.1. Anti-corruption measures include as follow:

- developing and adopting a Code of Ethics and official Employees behavior regulations;
- identifying subdivisions or officials responsible for the prevention of corruption and other offenses;
- conducting an anti-corruption expert review of the contracts signed,
- Informing the employer of any incitement to commit corruption offences
- Informing the employer of any information that becomes known to an employee about cases of corruption offenses committed by other employees, counterparties other employees, contractors of the organization or other persons;
- informing the employer about the emergence of a conflict of interest;
- conducting educational activities on preventing and counteracting prevention and counteraction of corruption;
- cooperation of the organization with law enforcement agencies

13. COOPERATION WITH ANTI-CORRUPTION ENFORCEMENT AGENCIES

13.1. Cooperation with law enforcement authorities is an important indicator of the Company's genuine commitment to the declared anti-corruption standards of behavior. This cooperation can take various forms:

- to report to the relevant law enforcement authorities about cases of corruption offenses that have become known in the organization;
- rendering assistance to authorized representatives of control and supervision and law enforcement agencies during their inspections of the activities of the organization on issues of preventing and combating corruption;
- assist authorized representatives of law enforcement agencies in carrying out measures to suppress or investigate crimes of corruption, including investigative measures;

- the management of the organization and employees should not allow interference in the performance of official duties by officials of judicial or law enforcement agencies.

14. PREVENTING AND RESOLVING CONFLICTS OF INTEREST PROCEDURES

14.1. The following principles form the basis for the Company's conflict of interest management:

- mandatory disclosure of actual or potential conflicts of interest;
- individual consideration and assessment of reputational risks for the organization in identifying each conflict of interest and its resolution;
- confidentiality of the process of disclosing information about the conflict of interest and the process of its settlement;
- observing the balance of interests of the organization and the employee in resolving the conflict interests;
- protection of the employee from prosecution in connection with the disclosure of the conflict of interest, that was timely disclosed by the employee and resolved (prevented) by the company.

14.2. These Regulations establishes the following responsibilities for employees in connection with disclosing and resolving conflicts of interest:

- an employee of the Company is obliged to take measures to prevent any possibility of a conflict of interest;
- when making business decisions and performing their job duties, be guided by the interests of the organization without regard to their personal interests or the interests of their relatives and friends;
- avoid situations and circumstances that could lead to a conflict of interest;
- disclose any actual or potential conflict of interest;
- assist in resolving the arisen conflict of interest.

14.3. The Company has established such types of conflict-of-interest disclosure as:

- Disclosure of conflicts of interest upon hiring;
- Disclosure of conflicts of interest upon transfer to a new position;
- Disclosure of information as conflicts of interest arise, etc.

14.4. An employee shall notify his or her immediate supervisor in writing of any conflict of interest or potential conflict of interest as soon as he or she becomes aware of it. The review of information submitted and the resolution of conflicts of interest is confidential. Information received is carefully reviewed by an authorized officer to assess the seriousness of the risks posed to the organization and to select the most appropriate form of conflict-of-interest resolution.

14.5. The Company may conclude that the situation reported by the employee does not constitute a conflict of interest and, as a result, does not need any special means of resolution.

14.6. The Company may also conclude that a conflict of interest exists and use various means to resolve it, including:

- restriction of an employee's access to specific information
- voluntary refusal of an employee of the organization or his/her removal (permanent or temporary) from participation in the discussion and decision-making process on issues that are or may be affected by a conflict of interest
- revision and change of functional responsibilities of an employee;
- the suspension of an employee if his or her personal interests are in personal interests are in conflict with functional responsibilities;
- transfer of the employee to a position that provides for the performance of functional duties that are not related to the conflict of interests;
- transfer of the employee's property that is the basis for the conflict of interest to a trust management company;
- renunciation by an employee of his or her personal interest that gives rise to a conflict of interest with the interests of the organization;
- dismissal of an employee from the organization at the employee's initiative;
- dismissal of an employee at the initiative of the employer for committing a disciplinary offense, i.e. for non-performance or improper performance by the employee at his/her fault of the assigned job duties.

The above list of resolution ways is not exhaustive. In each specific case, other forms of conflict-of-interest resolution may be found by agreement between the Company and the employee who disclosed the conflict of interest.

14.7. Responsible for the receipt of information on arising (existing) conflicts of interest is a structural unit or an official of the organization responsible for combating corruption.

14.8. Consideration of the information received is carried out collectively. Both the above-mentioned persons and other employees of the organization may participate in the review. The panel shall issue written recommendations to the persons concerned to resolve the conflict of interest no later than seven business days.

14.9. When a member of the Board and an interested person coincide is the same person, such member(s) of the Board shall not participate in the discussion of the conflict of interest and voting. When a conflict of interest involves the head of the organization, he/she also does not participate in decision-making on this issue.

14.10. Information on the possibility of occurrence or occurrence of a conflict of interest shall be submitted in the form of a conflict of interest declaration (Annex to these Regulations) in the following cases:

- when hiring, when appointing to a new position, during annual performance reviews for compliance with the organization's ethical business standards, when conflicts of interest arise.

14.10. These regulations do not attempt to describe every possible conflict of interest, that may arise. They should be resorted to in any situation where an arising personal interest of an interested party conflicts with the interests of the Company.

15. LIABILITY FOR FAILURE TO FULFILL (IMPROPER FULFILLMENT) OF THIS PROVISION

15.1. The head and employees of all departments of the Company, regardless of their position, shall be liable under the applicable laws of the Republic of Kazakhstan for compliance with the principles and requirements of these Regulations, as well as for the actions (inaction) of their subordinates, violating these principles and requirements.

15.2. Persons guilty of violating the requirements of these Regulations may be subject to disciplinary, administrative, civil or criminal liability at the initiative of the Company, law enforcement agencies or other persons in the manner and on the grounds provided by the laws of the Republic of Kazakhstan, local regulations and employment contracts.

Form of registration and accounting of notifications about the facts of inducement of employees to commit corruption offenses

No. n/a	Regist ration Date	Informati on about the notifier	Date and place of application. A brief statement of the circumstances of the case	Decision to conduct an inspection. (date, number)	Decision based on the results of the inspection	Date and outgoing number of materials sent to the prosecutor's office	note
1	2	3	4	5	6	7	8
1							