



1. GENERAL PROVISIONS

Corporate Code (hereinafter referred to as the "Code") is a set of fundamental moral and ethical principles and business norms that guide the employees of IFC COLOS. The Code reflects corporate values and defines the business conduct rules based on them.

The corporate code of ethics is developed with the aim of strengthening the business reputation of IFC COLOS, promoting fair and ethical business conduct, preventing abuses, and violations of legislation.

The objectives of this Code are:

- Consolidating the Company's Mission and Corporate Values;
- Defining rules of interaction of the Company with customers, business partners, government authorities, competitors, the public, mass media, etc.;
- Ensuring employees' awareness of personal responsibility towards clients, business partners, and colleagues for the performance of their duties, their role in the implementation of the Company's Mission;
- Developing corporate culture, aligning employees with common corporate goals, enhancing corporate identity.

This Code is developed based on universally recognized norms of business conduct, business ethics, international law, and legislation of the Republic of Kazakhstan and applies to all spheres of activity of LLP "IFC COLOS."

All Company documents, including those establishing relationships with customers, business partners, government authorities, competitors, and employees of the Company, are developed and approved in accordance with the provisions of this Code. Internal procedures, rules, and documents of the Company must comply with the approaches outlined in this Code.

Decisions taken by the Company's management should not contradict the rules declared in this Code. Strict adherence to established rules and commitment to corporate values are the key to the Company's success and the prerequisite for maintaining and developing high standards of business ethics.

This Code applies to all spheres of activity of LLP "IFC COLOS" and represents a minimum set of standards of business conduct and requirements. The Code is not an exhaustive set of rules and does not provide recommendations for every situation that may arise in the course of conducting business. The Code is an internal regulatory document of the Company, mandatory for implementation by officials and all employees regardless of their position.

2. TERMS AND DEFINITIONS

Business ethics is a set of ethical principles and norms of business communication that guide the Company, its Officials and Employees in their activities

The person concerned – individuals and legal entities entering into legal relations with the Company;

Image – a stable representation of partners and the public about the prestige of the Company and its reputation;

CODE – this Code of Business Ethics;

Company - TOO «IFC COLOS».

Counterparty (for the purposes of this Code) is any business entity having business relations with the Company, including a supplier, contractor, subcontractor, client, partner, agent.

Conflict – the interaction of people who have incompatible, contradictory goals or ways to achieve these goals;

Corporate culture is the specific values, principles, norms of behavior and attitudes adopted in the Company;

Conflict of interest - any situation or circumstances in which the personal interest or activities of an employee, his (her) close relatives prevent or may prevent employees from acting in the interests of the Company honestly, conscientiously, impartially and effectively perform their work duties.

Personal interest, that prevents or may prevent an employee from acting in the interests of the Company is the possibility of an employee (as well as his close relatives) receiving income in the form of money, valuables, other property or services of a proprietary nature, property rights or other benefits for themselves or third parties, with the exception of wages, in the performance of their work duties wages and other remuneration received by the employee.
IRD – internal regulatory documentation

3. MISSION, VISION, STRATEGY, POLICY

The Company's mission is to optimally (fully) meet the needs and expectations of customers in high-quality and economical transport and logistics services on local and international markets, ensuring maximum reliability.

The Company's vision is the constructive development of transport and logistics technologies based on constant improvements and continuous innovations aimed at achieving the highest results. Customer trust as a reliable partner

Corporate strategy is formed through corporate values:

Quality – a high degree of customer satisfaction with the service and services provided. We show flexibility in our approaches to solving the requests of all clients, establish long-term partnerships with clients and always achieve positive results by effectively organizing logistics services of the highest quality.

Efficiency - we work for results by minimizing efforts that do not bring value, we achieve success with limited resources at optimal cost.

Innovativeness - we are ready for changes and believe in the success of innovations, introduce new innovative (progressive) technologies and develop as an organization. We provide employees with opportunities for creative and personal realization, professional development, which is valuable both for the success of the company and for their careers. Our motto is: there is nothing that cannot be improved.

Teamwork – we work for a common result through consistency of goals and actions in a friendly atmosphere, respect, support colleagues and trust each other. We provide professional excellence and personal growth, as well as the opportunity for self-expression

Safety - we put the safety of conditions above all else, provide safe working conditions for all our employees and contractors, are responsible for each of our actions and the final result, we are responsible to colleagues, partners and society as a whole.

4. STATEMENT OF OBLIGATIONS AND RESPONSIBILITIES

The Company assumes obligations:

- **To shareholders:** protect investments and ensure value growth comparable to other leading companies in the logistics industry, build their relationships with shareholders in such a way as to ensure the best protection of their legitimate rights;
- **To Employees:** respect the rights and freedoms of employees, treat all employees with trust, provide them with equal opportunities, decent and safe working conditions;
- **To customers:** to gain and maintain the trust of customers by developing and offering the best solutions, ensuring impeccable quality, safety for humans and the environment;
- **To contractors and business partners:** strive for long-term cooperation and partnerships with contractors, suppliers, partners based on mutual benefit, respect, trust, honesty and fairness, consistently fulfill contractual obligations;
- **To society:** adhere to the principles of honest and open business conduct, carry out activities taking into account the principles of social responsibility, faithfully comply with the law, be a responsible taxpayer, not resort to illegal forms of competition, pay the necessary attention to health, labor, environment and human safety.

To fulfill its obligations, the Company follows the principles of doing business:

- Having a focused strategy
- Creation of a mechanism for continuous improvement of the quality of services
- Respectful attitude, solidarity, mutual support
- Organization of effective operational activities
- Regular marketing and successful sales
- Implementation of IT systems and innovative technologies
- Focus on the end result
- Creation of an integrated security system;

The main principle that the Company adheres to in carrying out its activities is to ensure that all activities comply with all applicable laws and regulations and the highest ethical standards of business conduct.

5. STANDARDS OF BUSINESS CONDUCT

The fundamental norms of the company's activities and business conduct of management and employees include the following.

Human rights and equal opportunities

The Company supports and adheres to the principles proclaimed by the World Declaration on Human Rights, conventions of the International Labour Organization and guarantees that the applied business methods do not violate human rights in any way.

The Company adheres to the principles of human rights protection for all its employees, as well as, where possible, through its spheres of influence.

Harassment in any form, offensive, intimidating or hostile actions or behavior are prohibited in the Company, it is prohibited to humiliate the honor and dignity of other people, to allow statements and (or) actions of an offensive nature related to national, religious, ethnic affiliation, language, gender, age, social, marital status, political beliefs, physical abilities of a person and other similar characteristics

The Company is not involved in human rights violations and encourages suppliers, customers and partners to adhere to human rights standards.

Employees are hired and receive equal opportunities for career growth, regardless of age, gender, nationality, religion, social, marital status, political beliefs, membership in public associations.

The Company's employees have the right to personally participate in the legitimate activities of political parties and public organizations, however, the employee's political activities and contributions may be regarded as such on behalf of the Company, and may affect the Company's reputation. The employee must ensure that his personal political activities are not represented on behalf of the Company.

Freedom to choose the type of employment

In all types of activities of the Company and its employees, the following are prohibited: debt slavery; forced, slave or serf labor; forced labor of prisoners, human trafficking.

Any type, volume and complexity of work in the process of providing services on behalf of the Company is carried out on a voluntary basis.

Under no circumstances is child labor used in the Company and by the Company.

All employees must meet the minimum age requirements established by the legislation of the Republic of Kazakhstan.

Occupational health and safety

The Company proclaims the principle of intolerance to violations in the field of occupational safety and health. All, without exception, injuries, incidents and accidents, as well as the prerequisites for them, are subject to investigation.

Violation of the requirements of labor protection and industrial safety and environmental protection inevitably entails the application of liability measures to employees in accordance with current legislation.

All employees, regardless of their position, are required to know and comply with the requirements of the legislation of the Republic of Kazakhstan, GNI in the field of occupational safety and health; stop performing any work if it becomes unsafe, immediately report such a case to their immediate supervisor or a safety specialist; start/allow work to be performed- you are only provided that the employee has the appropriate qualifications for the job, has completed training and is medically fit.

It is forbidden to conceal information about accidents and incidents, fires, occupational injuries, and violations of the technological regime.

Employees involved in the production and technological process are required to monitor compliance with the requirements of labor protection, industrial safety and environmental protection by other employees, including employees of contractors.

Employment relations

Work and career in the Company is the sphere of the most honest competition of talents, knowledge and efforts. For

a successful career, it is necessary to follow the principles of corporate culture, improve the performance of their functions, acquire new knowledge and skills, and independently take initiatives to improve processes.

The Company considers it not only a legal obligation, but also a public duty of all employees to comply with labor legislation, including provisions on employment, training, advanced training, evaluation, provision of guarantees and compensation, application of disciplinary penalties, and dismissal.

In case of discovery of facts or suspected violations in the field of labor relations, employees are obliged to immediately report this by sending a message to redline@colos.kz

Competition protection and antitrust law

The Company participates in competition honestly and in good faith in accordance with the law, strictly adheres to the legislation on protection of competition and the antimonopoly legislation of the Republic of Kazakhstan.

Employees, within the framework of their competence and work obligations, comply with the requirements of anti-monopoly legislation and GNI in the field of competition protection and compliance with antimonopoly legislation.

It is strictly prohibited to create discriminatory conditions for individual contractors, enter into any, including informal, agreements with competitors on issues related to pricing, discuss, exchange any information with competitors regarding pricing, service volumes, contractors.

In case of discovery of facts or suspicion of violations in the field of competition protection, employees are obliged to immediately report this to redline@colos.kz

Fighting corruption, fraud and conflict of interest prevention

Employees are required to comply with legislation and GNI on combating fraud and corruption.

It is prohibited to offer, promise, give, extort or receive bribes in any form, commercial bribery, abuse of authority, demonstration of readiness to make or accept any illegal payments.

It is prohibited, acting on behalf of and (or) in the interests of the Company, to allow any unlawful attempts to influence the decisions of government agencies.

A necessary condition for employees to effectively perform their work duties is the absence of a conflict of interest, and if there is one, its timely disclosure and settlement. Employees are required to know and comply with the requirements of this Code and the GNI in the field of conflict of interest management.

In case of a conflict of interest, the employee is obliged to immediately inform about it in accordance with the procedure established by this Code and the GNI. If an employee doubts the existence of a conflict of interests or how certain circumstances should be assessed, they should contact redline@colos.kz for clarification

The employee is advised to refrain from participating, directly or indirectly, in making decisions or performing actions related to a specific conflict of interest situation, until appropriate recommendations are received in accordance with the GNI.

Information about a conflict of interest is subject to thorough verification and consideration in accordance with the requirements of the Company's Internal Revenue Service in order to assess the risks and choose the most appropriate form of settlement of this conflict of interest.

Employees are prohibited from offering, transferring or accepting any means of encouragement or gifts if this may cause a conflict of interest in the performance of their duties by employees, whether such actions violate the law or may damage the business reputation of the Company.

In case of discovery of facts or suspicions of embezzlement, fraud, corruption, conflict of interest, employees are obliged to immediately report this in accordance with the procedure established by the GNI, for example, by sending a message to redline@colos.kz

International operations, import-export sanctions

The Company is obliged to comply with applicable international legislation in the field of export and import control and all applicable sanctions programs, does not cooperate with individuals or legal entities if such business relationships may violate the rules of applicable sanctions programs

The legislation of the Republic of Kazakhstan on export control and sanctions provides a legitimate basis for controlling the sale, transfer, electronic exchange or disclosure of information, software, goods and services across state borders. Export includes transmission by electronic means, through discussion or visual inspection of the object. The legislation of the Republic of Kazakhstan on import control and sanctions provides a legal basis for controlling the purchase, transfer, electronic exchange or disclosure of information, software, goods and services under the jurisdiction of the Republic of Kazakhstan.

The Company's employees must know and comply with all applicable laws and other regulatory legal acts in the field of international trade and export-import control, comply with the requirements regarding international economic sanctions, as well as other Company policies and procedures and applicable standards, ensure proper due diligence of counterparties to ensure that they are not included in the lists of sanctions that the Company complies with or other restrictive measures have not been introduced against them, to ensure the accuracy of records of transactions on imported and exported goods and services, not to hide information about the origin of products or their end users.

Making contributions for political and non-political purposes

The Company does not contribute directly or indirectly to political purposes. Contributions for non-political purposes, sponsorship, donations, charitable contributions and social programs must be made in accordance with the provisions of the Company's policies and agreements in accordance with the established procedure.

The Company respects the right of its employees to participate in political activities, but employees should not engage in such activities during working hours to the detriment of the effective performance of their official duties.

Employees who have joined a political party must clearly state that they carry out such activities solely on their own behalf, and not on behalf of the Company or in connection with it. Personal contributions of employees for political purposes are not reimbursed.

Gifts and cultural and entertainment events

All employees of the Company are required to comply with the requirements of the Regulations on gifts and cultural and entertainment events. You can offer or receive gifts from third parties, as well as accept or provide business hospitality, only if you comply with the requirements of the Regulations on Gifts and Cultural and Entertainment Events and applicable legislation.

Regardless of the established limits, do not accept any gifts or tokens of business hospitality that seem inappropriate or unreasonable in accordance with the provisions of applicable policies, including Anti-Bribery and Corruption Policies.

Never demand gifts from suppliers, customers or any other persons. If a supplier or contractor offers gifts or business hospitality, employees should contact their immediate supervisor or compliance specialist and obtain the necessary approvals in accordance with the Regulations on Gifts and Cultural and Entertainment Events.

Not to offer or give gifts to any person and not to provide signs of business hospitality, which will create a feeling in the recipient that this imposes any obligations on him; not to encourage anyone to improperly perform their duties in order to obtain or maintain business advantages.

Protection of personal data

Personal information received from employees and third parties, which is stored in the Company, must be protected from unauthorized access and disclosure, theft and damage in accordance with the provisions of legislation, as well as the Company's policies and procedures.

Personal data of employees and third parties must be properly stored and protected. The Company and its employees must not disclose personal data to any persons or organizations in violation of any provisions of applicable data protection legislation.

The Company strives to protect the privacy of employees, however, it reserves the right to control the use of Company property (for example, computers, electronic mail, telephones, confidential information owned by the Company, etc.) in accordance with legislation and internal policies and procedures in cases where this is allowed applicable laws and internal policies and procedures.

Protection of confidential information

Employees are required to protect confidential information of the Company and can only use it to fulfill their duties. Disclosure of information to third parties is allowed in case of official necessity or its disclosure is required by law.

Only authorized persons can make official statements on behalf of the company. If there are opinions on whether disclosure of confidential information is acceptable and to whom it can be provided, you should contact compliance or legal services.

Employees are required to:

- not to disclose confidential information or vulnerable/commercial information outside the Company during the period of work and after dismissal;
- if it is appropriate to require third parties to sign a non-disclosure agreement on confidential information, if confidential or other vulnerable information is provided to these persons;
- exercise caution during the storage, transmission and processing of confidential information. Confidential information should be stored in a safe and secure place and should not be left where it can be stolen, damaged or accessed by unauthorized persons (for example, in an employee's car);
- avoid discussing confidential information in public places and do not view confidential information where its contents can be heard or seen by others;
- use passwords to protect the integrity of the Company's systems;
- do not connect hardware that does not belong to the company, and do not download any software without appropriate permission;
- do not violate intellectual property rights and software license agreements.

Accounting and reporting

Accurate accounting is an essential factor for a successful business, since accounting is the source of data that ensures decision-making by shareholders, counterparties and the company. Accurate accounting should be ensured for both financial and non-financial indicators.

All accounting documents of the Company must contain complete, accurate and reliable information and comply with applicable standards, legislation and regulations on accounting, financial, management and tax reporting. Falsification of documents, transactions, as well as their intentionally incorrect interpretation are unacceptable and cannot be justified by anything.

All transactions must be timely, accurately, correctly and with a sufficient level of detail reflected in the accounting, documented and available for verification and (or) audit.

All employees are required to obtain permits for the transaction from a person with the appropriate level of authority and ensure the safety of all material, financial, information and other assets of the companies

Reports of violations

If employees have any concerns or suspicions that another employee or business partner or counterparty has violated the provisions of this Code, they should inform their immediate supervisor, a higher-level manager, who will be able to investigate this issue and take the necessary measures.

If necessary, all employees should provide full cooperation in conducting investigations on issues related to compliance with applicable legislation, the provisions of the Code or other Company policies.

An employee who wishes to make a statement anonymously should be able to provide information about the situation sufficient to conduct a proper investigation.

Any applicant can contact the Hotline using the following Hotline Communication Channels:

Email: redline@colos.kz ;

☐ Phone: +7 (701) 331-18-18

The redline@colos.kz hotline@colos.kz for reporting violations is completely confidential, it is served around the clock and seven days a week.

The Company guarantees that the employee's provision of information about violations of the Code will not become a matter of publicity and will not cause negative consequences in relation to the official position of the employee who provided such information. Such actions, as well as the threat of retaliation, will be regarded as a violation of the provisions of the Code and a disciplinary offense.

6. RESPONSIBILITY FOR COMPLIANCE WITH THE CODE OF CORPORATE ETHICS

Responsibility for the organization of work on the implementation of the requirements and provisions of the Code rests with the General Director of the Company

For questions regarding the provisions of the Code and/or ethical issues that have arisen in the course of work, as well as for violations of the provisions of the Code, corruption and other illegal actions, officials and employees of the Company, as well as business partners and other interested persons, have the right to contact: the immediate supervisor, or the next-level direct supervisor, the legal service, compliance service, to the CEO.

If the direct manager has not taken measures aimed at preventing or eliminating a conflict of interest, or the measures

taken have not resulted in the elimination of a conflict of interest, the employee of the Company informs the General Director about this.

The Company takes non-compliance with the provisions of the Code, other policies and procedures seriously and can be regarded as serious disciplinary misconduct and such an employee may be subject to punishment up to dismissal.

Violations of the Code are subject to investigation in accordance with the legislation and internal documents of the Company. Employees who have committed violations of the rules and provisions of this Code, depending on the circumstances, may be held liable in accordance with the legislation of the Republic of Kazakhstan.

Examples of inappropriate behavior that may lead to disciplinary action:

- actions that violate Company policy;
- encouraging others to violate the Company's policy;
- untimely notification of an identified or suspected violation of the Company's policy;
- not providing assistance in checking possible violations of the Company's policy

Concealment, as well as intentional untimely disclosure of information about violations of the law and (or) this Code for any reason, is unacceptable, and will be considered as improper performance by an employee of his work duties.

Compliance by the Company's employees with the Code of Corporate Ethics is one of the most important elements of an objective assessment of their personal and professional qualities. Information on compliance with this Code is taken into account when evaluating and promoting staff.

Non-compliance and violation of the principles of the Code of Corporate Ethics will be considered as an action incompatible with the status of an employee of the Company.

7. FINAL PROVISIONS

Compliance, together with the Company's HR service, ensures familiarization with the Code:

- in relation to newly hired employees – familiarization with the Code when hiring;
- in case of changes and additions to the provisions of the Code – familiarization of Employees and Officials within 10 (ten) working days from the date of their entry into force.

The Code is an open document and is freely distributed by the Company to customers, partners and any other interested parties.

The Company monitors, conducts research, and conducts surveys on the state of Corporate culture and the level of business ethics of Company officials and employees.

The revision of the provisions of this Code and the analysis of the extent to which they are implemented in practice shall be carried out at any time, if necessary, but at least once every two (2) years.