

ANTICORRUPTION POLICY

APPROVED BY

General Director

LLP "IFC COLOS"

Zakarin A.Kh.



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This Anticorruption Policy reflects the commitment of LLP "IFC COLOS" (hereafter referred to as the Company) and its management to high ethical standards and principles of open and honest business practices, as well as the Company's dedication to enhancing corporate culture, adhering to best practices in corporate governance, and maintaining the Company's business reputation at an appropriate level.

The Company has set the following objectives:

- Minimize the risk of the Company, its management, and its employees, regardless of position, being involved in corrupt activities;
- Foster a consistent understanding among contractors, employees, and other parties of the Company's policy of zero tolerance toward corruption in any form or manifestation;
- Summarize and explain the main requirements of the anticorruption legislation of the Republic of Kazakhstan (hereafter referred to as RoK) that may apply to the Company and its employees;
- Establish the obligation for Company employees to know and comply with the principles and requirements of the anticorruption policy, key norms of applicable anticorruption legislation, and adequate measures to prevent corruption.

The fundamental principles of anticorruption efforts in the Company are as follows:

- *Zero Tolerance for Any Form of Corruption:* The Company adheres to a strict policy of zero tolerance for corruption in any form or manifestation in its operations. This principle means a strict prohibition for Company officers and employees, acting on behalf of or in the interest of the Company, from participating in corrupt activities directly or indirectly, personally, or through any intermediaries;
- *Management Commitment:* Management at all levels must declare their uncompromising stance against any form of corruption and demonstrate, observe, and implement this principle through their own actions;
- *Employee Engagement:* The Company informs its officers and employees about the provisions of the anticorruption legislation of the Republic of Kazakhstan (RoK) and encourages their active participation in forming and implementing anticorruption standards and procedures;
- *Inevitability of Punishment:* The Company declares that employees, regardless of their position, length of service, or other factors, will face inevitable consequences if they engage in corrupt activities while performing their duties;
- *Legality:* The Company strictly adheres to the anticorruption legislation of the RoK, ensuring that all its actions or inactions comply with applicable anticorruption laws;
- *Due Diligence:* The Company conducts due diligence on third parties and job candidates before deciding to initiate or continue business/employment relationships, to ensure their integrity, rejection of corruption, and absence of conflicts of interest;
- *Interaction and Coordination:* The Company facilitates interaction and cooperation with government bodies in the field of anticorruption activities, and coordinates efforts to combat corruption.

The Company regularly identifies, reviews, and assesses corruption risks that are inherent in its overall activities and in specific areas, and it implements measures to prevent corruption that reasonably address the identified risks.

The Company makes reasonable efforts to minimize the risk of business relationships with counterparties who may be involved in corrupt activities. This includes assessing the counterparties' tolerance for bribery by checking whether they have their own anticorruption measures or policies, their willingness to comply with this policy's requirements, and whether they include anticorruption clauses (provisions) in their contracts. Additionally, the Company seeks to promote mutual cooperation to conduct business ethically and prevent corruption.

Contracts with suppliers, clients, and other third parties must include the Company's approved exclusions and warranties regarding bribery and corruption, drafted in a standard format. Any exceptions must be justified and approved by the Company's General Director.

The Company and all its employees are obligated to comply with the anticorruption legislation of the Republic of Kazakhstan, including but not limited to the Criminal Code of the Republic of Kazakhstan, the Code of Administrative Offenses of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan "On Combating Corruption," and

other regulatory acts. The core requirements of these laws include the prohibition of offering bribes, the prohibition of accepting bribes, the prohibition of commercial bribery, and the prohibition of intermediating in bribery.

The requirements of the Anticorruption Policy apply to all types of activities and are mandatory for compliance by all Company employees, contracted workers, and partners.