



ANTI-CORRUPTION POLICY

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1. General Provisions

1. This Anti-Corruption Policy of a Limited Liability Partnership "ESGQ Rating Agency" (hereinafter referred to as the Policy) was developed in accordance with the Law of the Republic of Kazakhstan "On Anti-Corruption", other legislative acts of the Republic of Kazakhstan in the field of anti-corruption, as well as internal regulatory documents governing the activities of the limited liability partnership "ESGQ Rating Agency" (hereinafter referred to as the Partnership).

2. This Policy establishes:

- 1) the main provisions of anti-corruption in the Partnership;
- 2) managerial and organizational framework for the prevention of corruption offenses;
- 3) measures to combat, minimize and (or) eliminate the consequences of corruption acts;
- 4) training the employees of the Partnership in strict compliance with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Partnership;
- 5) formation of a legal culture for the Partnership's employees, ensuring the principles of honesty and transparency in the performance of official duties.

3. The purpose of this Policy is to strengthen control over the prevention and detection of corruption, as well as to create an atmosphere of strict rejection of corruption in the Partnership.

4. The objective of this Policy is to form a legal culture for the Partnership's employees, ensuring compliance with the principles of honesty and transparency in the performance of labor duties.

2. Definitions and Abbreviations

5. The following definitions and abbreviations apply in this Policy:

1) anti-corruption policy - legal, administrative and organizational measures aimed at reducing corruption risks, increasing public confidence in the activities of the Partnership, and other measures in accordance with the legislation of the Republic of Kazakhstan on anti-corruption;

2) corruption - illegal use by a person performing managerial functions in the Partnership, an employee of the Partnership, of his official (official) powers and related opportunities in order to obtain or extract personally, or through intermediaries, property (non-property) benefits and advantages for himself or third parties, as well as bribery of these persons by providing benefits and advantages;

3) Corruption risk - the possibility of factors and conditions arising that contribute to the commission of corrupt offenses;

4) Corrupt actions - intentional actions carried out by an employee or official of the Company, using their official position for the purpose of obtaining benefits in the form of property or other assets;

5) Counterparty - a legal or natural person with whom the Company has entered into or plans to enter into regulated civil law relations;

6) Person performing managerial functions in the Company - a person permanently, temporarily, or by special authorization performing organizational, managerial, or administrative functions in the Company;

7) Employee - a natural person in an employment relationship with an employer who directly performs work under an employment contract, excluding members of the executive body of the Company;

8) authorized anti-corruption body - the central executive body in the field of public service and anti-corruption, and its department, their territorial divisions, carrying out, within their powers, the functions of implementing the anti-corruption policy of the Republic of Kazakhstan and coordinating in the field of anti-corruption.

3. Types of Corruption Offenses

6. This Policy provides for a complete ban on committing corruption crimes/offences, including:

1) receiving or giving a bribe, including payments for simplification of formal procedures (facilitation payments);

2) obtaining other property benefits and advantages in accordance with anti-corruption legislation;

3) intentional misstatement of financial statements;

4) misuse and (or) misappropriation and (or) theft of the Partnership's assets: theft of funds, misuse of funds, theft of fixed assets, inventory items;

5) actions of a corrupt nature, abuse of official powers and exceeding official powers: use of one's official powers and related opportunities to obtain property benefits, violations in the procurement of goods, works, services, expressed in forgery and (or) falsification of documents, special overstatement or lowering the price of goods, work, services to obtain monetary rewards, expensive gifts or other benefits, deliberate destruction of information relevant to the activities of the Partnership, destruction of databases or changing information in them, implementation of programs to provide access to third parties or for personal purposes;

6) actions performed by counterparties in order to obtain additional profit, other actions that may cause damage to the Partnership and (or) the state;

7) provision by counterparties of knowingly false, altered or distorted information for the purpose of deception or misrepresentation and making a profit at the expense of the Partnership;

8) actions aimed at unauthorized penetration into the information systems of the Partnership or the acquisition of confidential information in order to make a profit and (or) damage the activities and (or) negatively impact the reputation of the Partnership.

7. Responsibilities of the Partnership's employees under the Policy:

Refrain:

- from committing and (or) participating in the commission of corruption offenses in the interests or on behalf of the Partnership;

- from behavior that can be interpreted by others as a willingness to commit or participate in the commission of a corruption offense in the interests of or on behalf of the Partnership;

Immediately inform the Director of the Partnership:

- about cases of inducing an employee to commit corruption offenses;

- about information that has become known to the employee about cases of corruption offenses committed by other employees, contractors of the organization or other persons;

- about the possibility of a conflict of interest arising or arising for the employee.

4. Anti-Corruption Measures

8. Anti-corruption measures include the following:

- 1) anti-corruption monitoring;
- 2) internal analysis of corruption risks;
- 3) prevention and resolution of conflicts of interest;
- 4) reporting to the authorized anti-corruption body on the work done to combat corruption in the Partnership (if there is a corresponding request).

5. Anti-Corruption Monitoring

9. Anti-corruption monitoring - the activities of the Partnership in collecting, processing, summarizing, analyzing and evaluating information regarding the effectiveness of anti-corruption policy, the state of law enforcement practice in the field of anti-corruption, as well as the perception and assessment of the level of corruption by the Partnership.

10. The subject of anti-corruption monitoring is the activities of the Partnership. Sources of anti-corruption monitoring are appeals from individuals and legal entities, publications in the media, reports from auditors, risk managers (if available), as well as other sources of information not prohibited by law.

11. The Partnership carries out anti-corruption monitoring on an ongoing basis and the results of anti-corruption monitoring serve as the basis for conducting an internal analysis of corruption risks.

12. The task of anti-corruption monitoring is to study problematic issues that contribute to manifestations of corruption in a certain area of activity of the Partnership.

6. Internal Analysis of Corruption Risks

13. Internal analysis of corruption risks (hereinafter referred to as Analysis) refers to activities aimed at identifying and studying the causes and conditions conducive to the commission of corruption offenses.

14. The object of the Analysis is the activities of the Partnership.

15. The analysis is carried out by an employee of the Partnership on the basis of an order from the Director of the Partnership.

16. The analysis is carried out in the following areas:

- 1) identification of corruption risks in the internal regulatory documents of the Partnership;
- 2) identification of corruption risks in the organizational and managerial activities of a structural unit.

17. The organizational and managerial activities of a structural unit mean the following questions:

- 1) personnel management, including personnel turnover;
- 2) resolution of conflicts of interest;
- 3) implementation of control functions.

18. Sources of information for conducting internal analysis of corruption risks are:

- 1) internal regulatory and other documents of the Partnership and regulatory legal acts of the Republic of Kazakhstan affecting the activities of the Partnership;
- 2) the results of inspections previously conducted by government agencies;
- 3) results of compliance risk assessment;
- 4) publications in the media;
- 5) applications from individuals and legal entities received by the Partnership;
- 6) judicial acts;
- 7) other information, the presentation of which is permitted by the legislation of the Republic of Kazakhstan.

19. Based on the results of the internal analysis of corruption risks, an analytical report is prepared containing:

- 1) information about identified corruption risks;
- 2) recommendations for their elimination;
- 3) deadlines for implementing recommendations to eliminate identified corruption risks.

20. An analytical report with recommendations for eliminating identified corruption risks is submitted to the Director of the Partnership for consideration and action.

7. Prevention and Resolution of Conflicts of Interest

21. Officials of the Partnership are prohibited from performing official duties if there is a conflict of interest. Persons performing managerial functions in the Partnership must take measures to prevent and resolve conflicts of interest.

8. Formation of an Anti-Corruption Culture

22. The formation of an anti-corruption culture is the duty of every manager and employee of the Partnership and is carried out through a set of educational, informational and organizational measures.

23. Anti-corruption education is a continuous process of education and training, carried out for the purposes of moral, intellectual, cultural development and the formation of an active civil position of non-acceptance of corruption by the individual.

9. Submission of Reports to the Authorized Anti-Corruption Body

24. The Partnership submits a Report on the ongoing anti-corruption work to the authorized anti-corruption body if the Authorized Body makes such a request to the Partnership.

25. The report must contain:

- 1) information about the state and ongoing work in the field of anti-corruption;
- 2) the results of an internal analysis of corruption risks;
- 3) information about the implementation or non-fulfillment (indicating the reasons for non-fulfillment) of the Partnership's plans on the issue of combating corruption.

10. Measures to Prevent Corruption

26. Prevention of corruption in the Partnership is carried out on the basis of the internal regulations of the Partnership through the application on an ongoing basis of the following basic measures:

- 1) checking counterparties to establish business reputation and identify conflicts of interest;
- 2) accounting for affiliates of the Partnership;
- 3) examination of draft internal regulatory documents of the Partnership, materials submitted to the director for approval, outgoing letters and other documents for the purpose of exclusion, norms that create conditions for corruption in the Partnership;
- 4) ensuring information security in the Partnership;
- 5) ensuring the functioning of feedback mechanisms;
- 6) conducting internal audits about possible cases of corruption.

11. Final Provisions

27. Responsibility for failure to comply with the requirements of this Policy lies with all employees of the Partnership within their competence.

28. Employees of the company, regardless of their position, bear responsibility under the current legislation of the Republic of Kazakhstan for compliance with the principles and requirements of this Policy, as well as the legislation of the Republic of Kazakhstan on anti-corruption;

29. Persons guilty of violating the requirements of this Policy may be brought to disciplinary, administrative, civil or criminal liability at the initiative of the Partnership, law enforcement agencies or other persons in the manner and on the grounds provided for by the legislation of the Republic of Kazakhstan.

30. Employees of the Partnership from the date of adoption of this Policy, and newly hired employees from the moment they begin to perform official and (or) labor duties in the Partnership, are required to familiarize themselves with this Policy and confirm that they have studied, understood and undertake to conscientiously follow this Policy.

31. Anything else not provided for in this Policy is regulated by the legislation of the Republic of Kazakhstan. If there are any contradictions between this Policy and the norms of the legislation of the Republic of Kazakhstan, the norms of the legislation of the Republic of Kazakhstan are subject to application.

Director
ESGQ Rating Agency LLP



(signature)

(date)

E.N.Karazhan