

APPROVED

by the decision of the Board of Directors

JSC «NC «KTZ»

dated February 14, 2019,

Protocol No. 2

updated version with amendments and additions made by resolutions of the Board of Directors of JSC «NC «KTZ» dated 11/29/2021 No. 14, dated 12/15/2023 No. 17, dated 10/23/2025 No. 14

The name of the policy is set out in a new version in accordance with the decision of the Board of Directors of JSC «NC «KTZ» dated October 23, 2025, Protocol No. 14

Confidential Information Policy of JSC «NC «KTZ» and its subsidiaries

1. Purpose of the document and general provisions

Paragraph 1 is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated October 23, 2025, Protocol No. 14

1. This Confidential Information Policy of JSC «NC «KTZ» and its subsidiaries (hereinafter referred to as the Policy) has been developed in accordance with the anti-corruption legislation of the Republic of Kazakhstan, ST RK ISO 37001 (including ISO 37001:2025 «Anti-bribery Management Systems» and ISO 37301:2021 «Compliance Management Systems») and internal documents of JSC «NC «KTZ» (hereinafter referred to as the Company).

2. This Policy establishes:

- 1) risk areas and types of violations;
- 2) guarantees to the applicant when submitting their messages;
- 3) channels of confidential information;
- 4) the procedure for submitting messages and their consideration;
- 5) the powers and responsibilities of participants in the confidential information process.

3. The purpose of this Policy is:

1) creating the foundations for enhancing a culture of openness and transparency in the Company's activities, preserving and strengthening a value system in Society that reflects intolerance to corruption, by providing employees and associates with access to communication tools that responsibly communicate their concerns about actual and alleged violations regulated by this Policy;

2) ensuring effective risk management in relation to possible violations of the principles of doing business and standards of conduct set out in the Code of Ethics and Conduct of JSC «NC «KTZ» and its subsidiaries, which can cause significant material damage, as well as reduce the reputation and trust in the Company by timely detection and prevention of these violations. The confidential information

system is one of the important tools for combating corruption and fraud in Society and is a means of preventing potential risks.;

3) ensuring the adoption of corrective measures based on the results of official investigations and strengthening internal control, based on the principle of zero tolerance for any manifestations of bribery and corruption.

4. To achieve these goals, this Policy provides for the introduction of an effective confidential information system as a mechanism for open dialogue, which promotes honesty and openness, professionalism and the desire to protect the rights and legitimate interests of Society.

2. Scope of application

5. This Policy is mandatory for review and application by all participants in the confidential information process, applies to all employees of the Company and associated persons and is subject to posting on the Company's corporate website.

Paragraph 6 is set out in a new wording based on the decision of the Board of Directors of JSC «NC «KTZ» dated October 23, 2025, Protocol No. 14

6. Subsidiaries of the Company (legal entities, more than fifty percent of the voting shares (participation interests) of which are directly owned by the Company by right of ownership or trust management) adhere to this Policy in full, observing all its provisions, based on decisions of the Board of Directors/The Supervisory Boards of the Company's subsidiaries or, based on this Policy, develop and adopt their own internal document.

7. This Policy is not applied when considering appeals from individuals and legal entities in accordance with the Administrative Procedural Code of the Republic of Kazakhstan (hereinafter referred to as the Code), and it is also not a way to initiate issues caused by personal dissatisfaction with the Company's employees.

3. Terms and definitions

8. The following terms and definitions are used in this Policy:

1) **anti-corruption legislation** – the Law of the Republic of Kazakhstan "On Combating Corruption" and other regulatory legal acts on anti-corruption issues;

2) **associated persons** – members of the Board of Directors, the Management Board of the Company, agents, joint venture partners, subsidiaries and dependent organizations, and other persons providing services to the Company or acting on its behalf;

Subparagraph 3) is set out in a new wording based on the decision of the Board of Directors of JSC «NC «KTZ» dated October 23, 2025, Protocol No. 14

3) **an external operator («Hotline»)** – is a legal entity independent of the Company that administers the initiative information channel on the basis of an agreement concluded with Samruk-Kazyna JSC;

Paragraph 8 was supplemented by subparagraph 3-1) based on the decision of the Board of Directors of JSC «NC «KTZ»» dated October 23, 2025, Protocol No. 14

3-1) **confidential (initiative) information channel** – channels for sending requests/messages administered by an external operator (Hotline website, telephone, e-mail, WhatsApp messenger) regarding the activities of Samruk-

Kazyna Group companies, the details of which are published on the website (Internet resource) The Company and its subsidiaries;

Subparagraph 4) is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated December 15, 2023 No. 17

Subparagraph 4) was supplemented with the second paragraph based on the decision of the Board of Directors of JSC NC KTZ dated October 23, 2025, Protocol No. 14

4) **Company official** – a person performing managerial functions in the Company, who, permanently, temporarily or by special authority performs organizational, administrative or economic functions in the Company, as well as a person authorized to make decisions on the organization and conduct of procurement, or responsible for the selection and implementation of projects financed from funds the head of the State Budget and the National Fund of the Republic of Kazakhstan, who holds a position not lower than the head of an independent structural unit in the Company;

The term "Company official" specified in subparagraph 4) of paragraph 8 of the Policy is used in the specified meaning and definition within the framework of this Policy;

5) **the applicant** – the author of the Message;

6) **Code of Ethics and Conduct of JSC «NC «KTZ» and its subsidiaries** – an internal document of the Company that establishes values, basic principles and standards of conduct aimed at developing corporate culture and strengthening the Company's reputation;

Paragraph 8 was supplemented by subparagraph 6-1) based on the decision of the Board of Directors of JSC NC KTZ dated December 15, 2023 No. 17

6-1) **confidential information** – information about a person's appeal to a higher-level manager and (or) the management of the Company of which he/she is (was) an employee, and (or) to authorized state bodies for the purpose of reporting the fact of a corruption offense or providing information about the whereabouts of a wanted person who committed a corruption offense, or providing other assistance of significance to identify, suppress, disclose and investigate a corruption offense, in the case of an agreement on non-disclosure of the specified information.;

7) **confidential informing** – is a process in which an employee and/or an associate expresses suspicions about the existence of committed or ongoing violations regulated by this Policy, with full confidence that the Company's management will take the necessary measures to conduct an audit, internal investigation and properly treat such reports.;

8) **employees** – individuals who are in an employment relationship with the Company;

Paragraph 8 was supplemented by subparagraph 8-1) based on the decision of the Board of Directors of JSC «NC «KTZ» dated December 15, 2023 No. 17

8-1) **assistance in combating corruption** – notification of the fact of a corruption offense, provision of information on the whereabouts of a wanted person who committed a corruption offense, as well as other assistance that is (subsequently) important for the detection, suppression, disclosure and investigation of a corruption offense;

9) **message** – information about relevant violations received through confidential information channels provided for in this Policy.;

10) **subject** – an employee and/or an official of the Company in respect of whom a notice has been filed;

Subparagraph 11) is set out in a new wording based on the decision of the Board of Directors of JSC «NC «KTZ» dated October 23, 2025, Protocol No. 14

11) **authorized person** – the head and/or employee of the Compliance Service of the Company/subsidiary, compliance controller of the subsidiary.

9. The definitions applied but not disclosed in this Policy correspond to the definitions used in the legislation of the Republic of Kazakhstan, the Charter and internal documents of the Company.

4. Risk areas and types of violations

Paragraph 10 is set out in a new wording based on the decision of the Board of Directors of JSC «NC «KTZ» dated October 23, 2025, Protocol No. 14

10. Communications from employees of the Company and associated persons who have expressed their concern about violations committed or being committed in the Company and inappropriate behavior of the subject are recorded and classified according to the types and subspecies of the following violations:

1) violations with signs of corruption:

- abuse of authority/abuse of official position;
- receiving illegal rewards and gifts;
- lobbying for interests and providing unreasonable preferences;

2) theft, fraud and data distortion:

- Misappropriation, embezzlement, theft and misuse of the Company's assets;
- deliberate distortion of financial, accounting or any other reporting data in order to obtain benefits, entering false information into documents regulating the internal processes of the company, forgery (drafting deliberately false documents, completely or partially changing the original document);

3) ethical violations, conflicts of interest and violations in the field of labor relations:

- non-compliance with corporate culture and standards of conduct;
- discrimination and harassment;
- violation of anti-corruption restrictions, including conflict of interest (without signs of corruption); - violation of labor rights and unequal conditions of employment;

4) Occupational safety and ecology:

- violation of occupational safety standards;
- violation of environmental regulations and requirements;

5) non-compliance with legislative and internal requirements:

- violation of legal requirements and internal requirements;
- violation of the requirements of procurement procedures;
- disclosure of confidential information;
- illegal use of insider information;

6) other.

5. Guarantees to the applicant

11. The Company guarantees:

The first paragraph of subparagraph 1) is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated October 23, 2025, Protocol No. 14

1) full protection of the applicant's rights and legitimate interests, including the preservation of his workplace in Society, and will not be subjected to repressive measures, harassment and/or discrimination. However, the protection provided to the applicant in accordance with this Policy does not constitute protection from disciplinary or other liability measures provided for by the legislation of the Republic of Kazakhstan for knowingly making a false report.

Subparagraph 1) was supplemented with the second paragraph based on the decision of the Board of Directors of JSC NC KTZ dated 12/15/2023 No. 17

The person who reported the fact of a corruption offense or otherwise provided assistance in combating corruption is protected by the state in accordance with the current legislation of the Republic of Kazakhstan.;

Subparagraph 2) is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated October 23, 2025, Protocol No. 14

2) confidentiality of the applicant, i.e. the impossibility of identifying the person in the case when the applicant is concerned and wishes to remain anonymous;

3) consideration of cases of harassment and/or discrimination of the applicant as phenomena leading to the adoption of disciplinary measures in accordance with the established procedure;

Subparagraph 4) is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated October 23, 2025, Protocol No. 14

4) complete confidentiality of messages. It is prohibited to discuss reports, the results of inspections/internal investigations and the measures taken. Legitimate liability measures will be applied to persons guilty of unlawfully disclosing any information related to the reports received, the results of the audit/internal investigation and the measures taken.;

5) refusal of attempts to conceal evidence confirming the information contained in the message;

6) taking disciplinary measures in accordance with the established procedure against persons who have destroyed or concealed evidence confirming the information indicated in the message.

6. Channels of confidential information

12. The confidential information system is the channels through which the Company receives information from its employees and associates about what causes them concern. Such channels perform the function of stable functioning and risk management of the Company in the field of ethics and compliance.

Paragraph 13 is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated October 23, 2025, Protocol No. 14

13. The applicant may apply orally or in writing, openly (specifying his personal data, signature/EDS) or anonymously (without specifying his data, without signature/EDS). In the case of an open appeal and the applicant does not wish to

further disclose his personal data, the Company considers such an appeal, ensuring the confidentiality of the applicant.

Employees of the Company and its subsidiaries may send requests/messages through the following channels and to the following persons:

1) to the external operator «Hotline» – through channels of proactive information;

2) to the head of the compliance function of the Company/compliance controller of the subsidiary organization - by e-mail;

3) to the first head of the Company/subsidiary – by e-mail.

Individuals and legal entities can send requests through the following channels and to the following persons:

1) to the external operator "Hotline" – through channels of proactive information;

2) to the first head of the Company/subsidiary – to blogs on the websites of the Company/subsidiary, as well as the official pages of the Company subsidiary on social networks.

Appeals may be referred to the compliance function of the Company/subsidiary by ombudsmen, internal audit services, and audit commissions of the Company/subsidiary if such appeals were received by these persons through other information channels, including during audits and other audits, and are not registered as incoming correspondence in accordance with the Company's current regulations/subsidiary organization's document management rules.

The authorized person posts information about the work of an external «Hotline» operator on the corporate website (Internet resource) The Company/subsidiary and in the corporate newspaper of the Company / subsidiary, as well as places posters and posters on the premises of the Company/ subsidiary and conducts compliance training (educational, explanatory).

It is important to understand that it is difficult to respond appropriately to an anonymous message, as it may be necessary to obtain additional information or disclose the information provided by the applicant. The availability of the applicant's data and the ability to communicate with him allows us to consider his message more carefully and effectively. The Company encourages employees and associates/third parties to provide their names and contact information to assist in the ongoing audit/internal investigation and inform the applicant about the results of the investigation. Also, the authorized person has the right not to consider anonymous appeals if they are not meaningful – they do not contain specific facts, verifiable information or evidence of violations that allow for an objective check, or are aimed at discrediting individuals without specific facts, or are based only on general judgments, emotional statements or threats. The criteria for reviewing anonymous requests are given in the Appendix to this Policy.

No provisions of the Company's/subsidiary's internal documents may prohibit applicants from reporting possible violations of the law directly to the relevant government agencies.

The Policy was supplemented by paragraphs 13-1, 13-2 based on the decision of the Board of Directors of JSC NC KTZ dated December 15, 2023 No. 17

13-1. Information about a person's appeal to a higher-level manager and (or) the management of the Company of which he/she is (was) an employee, and (or) to authorized state bodies for the purpose of reporting the fact of a corruption offense or providing information about the whereabouts of a wanted person who committed a corruption offense, or providing other assistance of significance to identify, suppress, disclose and investigate a corruption offense, It is considered confidential information in the case of a non-disclosure agreement and is provided in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

Disclosure of this information entails liability established by the laws of the Republic of Kazakhstan.

13-2. An agreement on non-disclosure of information on assistance in combating corruption is the basis for ensuring that the person who concluded this agreement provides confidentiality of information about a person's application to a higher-level manager and (or) the management of the Company of which he is (was) an employee, and (or) to authorized state bodies in order to assist in combating corruption.

The agreement on non-disclosure of information on assistance in combating corruption is concluded in accordance with the procedure established by the anti-corruption legislation of the Republic of Kazakhstan and internal acts of the Company.

7. The procedure for submitting messages and reviewing them

14. For effective processing of incoming messages and ensuring the effectiveness of internal investigations, the following format and structure of the message is recommended, regardless of the method of transmission by the applicant (in person, in writing or by telephone):

- 1) the author of the message;
- 2) contacts (postal/e-mail address, phone number) for feedback from the applicant;
- 3) the essence of the issue (the reason for concern) in an understandable form and known specific essential facts;
- 4) the official or employee in question and other necessary information;
- 5) any documents confirming the concern.

15. The information disclosed in the message must be reliable, and such disclosure is in good faith and without malicious intent. The applicant is not required to conduct an independent investigation into cases of non-compliance with the applicable legislation of the Republic of Kazakhstan, including anti-corruption legislation and/or internal procedures.

16. Based on reports received orally during a face-to-face meeting (subitems 1) and 2) of paragraph 13 of this Policy), the immediate supervisor or authorized heads of structural divisions through direct communication channels shall compile a brief confidential report on the contents of the oral communication, measures taken, proposals on ways to resolve the issues raised, which are transmitted to the commissioner to a person (or are registered by an authorized person).

17. Messages received by an authorized person and an external operator are recorded by the authorized person in the message log.

18. The communications are reviewed by the authorized person as soon as they are received. The authorized person conducts initial processing to classify by risk level, determine the type of violation in accordance with paragraph 10 of this Policy and the need for an internal investigation, and distributes the review of the message among authorized structural units in accordance with the annex to this Policy.

19. Communications not related to the Company's activities are not subject to review, as well as in cases where:

1) the message does not contain data about the subject (when it is impossible to identify the subject based on the information in the message);

2) the message does not disclose the essence of the violation or the violation is not included in the risk areas provided for in this Policy.;

3) the message is simultaneously addressed to several authorities, including the Office of the Company/the management of the Company/ government agencies. Such communications are considered within the framework of the Code;

4) there are no internal experts to conduct an internal investigation, and the involvement of external experts is not possible;

Subparagraph 5) of paragraph 19 is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated 11/29/2021 No. 14

5) the message contains information about upcoming or committed criminal offenses or about a threat to state or public security. Such messages are subject to immediate redirection to government agencies in accordance with their competence.;

Paragraph 19 was supplemented by subparagraph 6) based on the decision of the Board of Directors of JSC NC KTZ dated 11/29/2021 №14

6) the repeated messages do not contain new arguments or newly discovered circumstances, and the reply sent to the applicant, according to the previous message, contains the necessary verification materials.

Paragraph 20 is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated 12/15/2023 No. 17

20. The Company's Compliance Service has the right to conduct inspections and internal investigations on its own without issuing an act of the employer or by creating a working group.

When making a decision to conduct an internal investigation, the authorized person determines the responsible structural unit (responsible person) in accordance with the list of structural units for reviewing communications in accordance with the annex to this Policy or, if necessary, forms a working group to conduct this investigation.

8. Powers and responsibilities of participants in the confidential information process

21. The powers and responsibilities of the authorized person within the framework of the confidential information process include (but are not limited to the above):

1) receiving and registering reports of possible violations, initial processing for classification by risk level, distribution of consideration of the report among authorized structural units in accordance with the annex to this Policy, and determination of mechanisms for conducting an internal investigation, if necessary;

2) informing the applicant about the results of the investigation and the measures taken;

3) interaction with the heads of structural divisions and the management of the Company in order to form working groups on investigation, if necessary;

Subparagraph 4) was amended based on the decision of the Board of Directors of JSC NC KTZ dated December 15, 2023 No. 17

4) submission of semi-annual reports on the implementation of this Policy to the Audit Committee/To the Board of Directors of the Company, JSC «Samruk-Kazyna» (upon request), as well as ensuring the inclusion of information on the work of the hotline in the Annual Report on the Sustainable Development of the Company;

5) conducting awareness events about the work of the hotline among employees and associates, as well as conducting training events on this Policy. Newly accepted employees of the Company are required to undergo training in accordance with this Policy as part of the adaptation course.

22. The powers and responsibilities of the head of the Internal Audit Service and the Company's Ombudsman within the framework of the confidential information process include (but are not limited to):

1) receiving a report of possible violations and fair, comprehensive, conscientious and objective consideration of it with the mandatory establishment of facts confirming (refuting) the content of the message;

2) consideration of the possibility of providing recommendations (feedback) to the applicant who has expressed concerns or personal resolution of concerns, if possible. If it is impossible to resolve the issue, send it to an Authorized Person for consideration.;

3) consideration of the need for an internal investigation;

Subparagraph 4) of paragraph 22 is set out in a new wording based on the decision of the Board of Directors of JSC NC KTZ dated 11/29/2021 No. 14

Subparagraph 4) was amended based on the decision of the Board of Directors of JSC NC KTZ dated 12/15/2023 No. 17

4) informing the authorized person within the prescribed time about the results of the investigation and the measures taken, as well as, if necessary, about the extension of the deadline for reviewing the message with prior notification to the authorized person;

5) ensuring that their employees are aware of this Policy and the established procedure;

6) Encouraging open dialogue among employees who can easily express their concerns.

23. The powers and responsibilities of the heads of responsible structural divisions (responsible persons) and their supervising managers, as well as working groups on internal investigation within the framework of the confidential information process include (but are not limited to the above):

1) receiving a report of possible violations and fair, comprehensive, conscientious and objective consideration of it, with the mandatory establishment of facts confirming (refuting) the content of the message;

2) consideration of the possibility of providing recommendations (feedback) to the applicant who has expressed concerns or personal resolution of concerns, if possible. If it is impossible to resolve the issue, send it to an authorized person for consideration.;

3) consideration of the need for an internal investigation;

Subparagraph 4) of paragraph 23 is set out in a new wording based on the decision of the Board of Directors of JSC «NC «KTZ» dated 11/29/2021 No. 14

Subparagraph 4) was amended based on the decision of the Board of Directors of JSC NC KTZ dated 12/15/2023 No. 17

4) informing the authorized person within the prescribed time about the results of the internal investigation and the measures taken, as well as, if necessary, about the extension of the time limit for reviewing the message with prior notification to the authorized person.;

5) ensuring that their employees are aware of this Policy and the established procedure;

6) Encouraging open dialogue among employees who can easily express their concerns.

24. The applicant's powers and responsibilities in the confidential information process include (but are not limited to):

1) a conscientious, reliable expression of concern, without malicious intent and personal gain;

2) responsibility for giving a deliberately false message. In the event that retaliatory measures have been taken against the applicant or if the applicant has become aware of retaliatory measures taken against someone who has responsibly reported his concerns, the applicant should be immediately informed through the specified information channels.

Appendix
to the Confidential Information
Policy of JSC «NC «KTZ» and
its subsidiaries

The appendix is set out in a new version based on the decision of the Board of Directors of JSC «NC «KTZ» dated October 23, 2025, Protocol No. 14.

The criteria for reviewing anonymous requests are:

1) the specifics of the event or violation;

What is required: an indication of the date, place, and circumstances of the alleged violation.

For example: a meaningful appeal – on September 10, 2025, the head of the supply department used a Toyota Camry company car for personal purposes to travel to Astana;

it's not a meaningful appeal – the management of the organization constantly uses cars for personal purposes;

2) identifiable participants;

What is required: last name, first name, patronymic (if any), position, department, or other description that allows you to identify the person.

For example: a meaningful appeal – the director of the Akmola branch hired a leading specialist in the supply department, R.Zh. Syzdykov, without conducting competitive procedures;

not a meaningful appeal – the management violates the established requirements when hiring;

3) evidence confirming the information in the application; What is required: attached materials (copies of documents, photo or video materials, etc.) or links to verifiable sources.

For example: a meaningful appeal – the logistics department has concluded a service purchase agreement No. 1111111 dated January 12, 2025, which can be checked on the procurement portal, in which the cost of services is overestimated compared to the commercial offer;

It's not a meaningful appeal – logistics department employees take bribes and everyone knows about it;

4) verifiability of information;

What is required: information that can be verified through internal systems or external registers.

For example: a meaningful appeal – in the period from August 11, 2025 to August 13, 2025, the HR department manager D.S. Kasenova was absent from the workplace, while the timesheet indicates that she was at the workplace on the specified days. Video recording of the arrival and departure of employees is carried out in the production room;

inappropriate treatment – some employees violate the work schedule;

5) no signs of abuse;

What is required: the appeal should not contain threats, insults and unsubstantiated accusations;

For example: a meaningful appeal – Deputy Director Akhmetov D.S. in April 2025, he repeatedly sent employees of the station to carry out personal assignments (building a house in the city of Karaganda, at 12 Chkalov Street);

It's not a meaningful appeal – the management is mired in corruption, constantly uses employees for their own purposes, and strict measures must be applied to them, including their dismissal.