

Approved
by order of the Chief of Staff of the
joint-stock company "National
Company "Kazakhstan Temir Zholy"

**Human Rights Policy in the Joint-Stock Company "National
Company "Kazakhstan Temir Zholy"**

Group of documents:	Operational document
Developer:	Human Resources Management Department
Responsible for the analysis and updating of the document:	Human Resources Management Department

1. Introduction

1. This Human Rights Policy in Kazakhstan Temir Zholy National Company Joint-Stock Company (hereinafter referred to as the Policy) has been developed in accordance with the Constitution of the Republic of Kazakhstan, the Labor Code of the Republic of Kazakhstan, the Code of Ethics and Conduct of Kazakhstan Temir Zholy National Company Joint-Stock Company (hereinafter referred to as the Company), the Roadmap of NC KTZ JSC to improve the ESG rating for 2024-2025, approved by the decision of the Company's Management Board dated May 13, 2024 (Minutes No. 02/12), as well as the Convention concerning Discrimination in Respect of Employment and Occupation (Geneva, 1958), the International Labour Organization Declaration on Fundamental Principles and Rights at Work and its Implementation Mechanism (Geneva, 1998).

2. The Company recognises the importance of respecting and observing fundamental human rights proclaimed by the United Nations, including the rights to work, gender equality, and a favourable environment.

3. The provisions of the Policy must be observed by all employees of the Company and included in the system of business relations with suppliers and stakeholders.

2. Terms and abbreviations

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| Stakeholders | - individuals, legal entities, groups of individuals or legal entities that have or may have an impact on the activities of the Company, its products or services and related activities, by virtue of the norms of the legislation of the Republic of Kazakhstan, concluded agreements, contracts or indirectly (indirectly). This definition does not apply to all those who may be familiar with the Company or express an opinion about it, the main representatives of stakeholders are shareholders, employees, customers, suppliers, government agencies, creditors, investors, public organizations, the population of the regions in which the Company operates; |
| A person with a disability | - a person who has a health disorder with a persistent impairment of body functions due to diseases, injuries (wounds, traumas, contusions), their consequences, disorders, which leads to a limitation of life activities and the need for social protection; |
| Treatment | - individual or collective written, oral or in the form of an electronic document certified by an electronic digital signature, proposal, application, complaint, |

- Human rights** - request or response;
- the fundamental rights and freedoms inherent in every person from birth, regardless of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or any other status;
- Forced labour** - all types of work or services, the performance of which is forced under the threat of punishment;
- Supplier** - winners of procurement procedures, agents, intermediaries, consultants, performers and contractors of the Company.

3. Respect for human rights

4. The Company follows the principles of respect for human rights:

- 1) maintaining a work environment free from any manifestations of physical, verbal, psychological pressure or harassment, aggression, abuse or threats in the workplace by colleagues or management;
- 2) recognition of the rights of employees to freedom of assembly and association, collective bargaining, freedom of opinion and expression;
- 3) Prevention of any form of discrimination against any person on the basis of age, sex, ethnicity, religion, disability, nationality, social status.
- 4) recognition of equal opportunities for women and men, equal pay;
- 5) prevention of child, forced and forced labor, human trafficking;
- 6) ensuring a safe and healthy working environment in the workplace for all employees;
- 7) respect for the rights, cultural characteristics and customs of local communities in the regions where the Company operates;
- 8) manifestation of absolute intolerance in relation to corruption offenses.

4. Policy Implementation

5. The Company recognises and respects the rights and freedoms of employees, suppliers, and stakeholders, provides maximum assistance in observing rights, and strives to raise awareness of human rights issues.

6. The Company undertakes:

- 1) ensure that stakeholders have access to this Policy and human rights training materials;
- 2) identify, analyse and assess potential risks of human rights violations and develop timely response measures before the occurrence of adverse consequences in order to minimise any potential negative impact of its activities on the rights of the Company's employees;
- 3) conduct a survey among the Company's employees, if necessary, in order to assess awareness and respect for human rights.

5. Human Rights Verification

7. The Company regularly monitors, reviews and analyses complaints from employees, suppliers and stakeholders regarding the observance of human rights. The Company has various communication channels for submitting and considering appeals (office service, hotline, E-Otinish information system, etc.).

8. Each received request is subject to thorough verification in accordance with the procedure provided for by the Company's internal documents.

9. The Company ensures the operation of complaint review processes designed to be legitimate, accessible, fair, and transparent.

10. The risks identified during the review of complaints are included in the company-wide risk management system, which makes it possible to effectively control, monitor and minimise possible human rights violations at all levels of the Company's activities.

11. The Company ensures transparency in human rights issues by publishing the results of inspections, information on key initiatives, measures taken and results achieved in the field of human rights in the Company's integrated annual report published on the corporate website.

6. Final provisions

12. This Policy is subject to periodic review to ensure compliance with the legislation of the Republic of Kazakhstan and international standards in the field of human rights protection.

13. The company annually trains employees in the principles of human rights.

14. The Company makes this Policy freely available on the Company's corporate website.