
Approved
by order of the Chief of Staff of
the National Company
"Kazakhstan Temir Zholy" Joint
Stock Company

**Policy for the Prevention of Harassment and Discrimination in
the Joint Stock Company
"National Company "Kazakhstan Temir Zholy"**

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

1. Purpose and scope

1. The purpose of this Policy for the Prevention of Harassment and Discrimination in the Joint Stock Company "National Company "Kazakhstan Temir Zholy" (hereinafter referred to as the Policy) is to determine and establish norms and rules of conduct in the Joint Stock Company "National Company "Kazakhstan Temir Zholy" (hereinafter referred to as the Company), ensuring the creation and maintenance of a working environment free from all forms of discrimination, harassment, as well as an atmosphere conducive to the development of professional skills of employees Company. The Company accepts that harassment and discrimination in the field of work humiliate human dignity and violate generally recognized international legal norms and standards.

2. This Policy has been developed in accordance with the provisions of the Constitution of the Republic of Kazakhstan, the Labor Code of the Republic of Kazakhstan, the Company's Roadmap for Improving the ESG Rating for 2024–2025, approved by the decision of the Management Board dated May 13, 2024 (Minutes No 02/12) and other regulatory legal acts of the Republic of Kazakhstan, as well as the Convention on Discrimination in Respect of Employment and Occupation (Geneva, 1958), International Labour Organization Declaration on Fundamental Principles and Rights at Work and its Implementation Mechanism (Geneva, 1998), International Labour Organization Convention on the Elimination of Violence and Harassment in the World of Work (Geneva, 2019).

3. This Policy applies to all employees of the Company in the following cases:

- 1) performance of official duties both at the workplace and when on business trips, trips, training;
- 2) use of the Company's property (personal computers, laptops, tablets, phones, the Company's corporate website, corporate e-mail, electronic document management system);
- 3) participating in any social events or events organized by the Company;
- 4) interaction with customers, passengers, suppliers and other persons.

2. Terms and abbreviations

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| Discrimination | - Any distinction, exclusion or preference based on race, colour, sex, religion, political opinion, national origin or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment and occupation (Article 1, paragraph 1, of the International Labour Organization Convention concerning Discrimination in Respect of Employment and Occupation No. 111); |
| Applicant | - A person who reports harassment and/or discrimination of any kind; |
| Violator | - The person or persons alleged to have committed harassment and/or discrimination; |
| Sexual Harassment | - Types of unwanted sexually motivated behaviour, such as |

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| | physical contact and molestation, sexually suggestive remarks, display of pornographic material and sexual advances, whether in the form of statements or actions (Article 11, paragraph 18, of the Convention on the Elimination of All Forms of Discrimination against Women No19); |
| Victim | - A person who has been or is being harassed and/or discriminated against; |
| Supplier | - winners of procurement procedures, agents, intermediaries, consultants, performers and contractors of the Company; |
| Message/Message | - the Complainant's complaint about the committed act of harassment and/or discrimination, or the assumption that such an act has been committed, or about the impending act of harassment and/or discrimination; |
| HR | - the Company's network level unit responsible for the implementation of the HR policy. |

3. Basic principles

4. This Policy is based on the following principles:

1) providing equal employment opportunities. No one may be restricted in the rights in the field of labor, except in cases and in the manner that are expressly provided for by the Labor Code of the Republic of Kazakhstan or other regulatory legal acts of the Republic of Kazakhstan;

2) zero tolerance for any forms of discrimination and harassment in the workplace, including premises owned or temporarily used by the Company, territories where the Company operates, which can reasonably be considered as part or continuation of the workplace.

4. Types of harassment and discrimination

5. Harassment and discrimination in any of its manifestations are prohibited, but not limited to:

1) Undesirable requests and demands, when explicitly or implicitly, can promise benefits or negative consequences for the service. Verbal abuse or jokes of an offensive nature, unpleasant statements about nationality and gender, religion or religious beliefs, race, figure or appearance, obscene anecdotes, statements, hints or actions;

2) meaningful looks, offensive or indecent sounds, whistling, obscene gestures;

3) creating an intimidating, hostile, or negative work environment by making unpleasant or undesirable conversations, suggestions, requests, demands, physical contact or attention, offensive or otherwise inappropriate content for employees;

4) Displaying or discussing any written, graphic, audio or video material, including material that contains offensive connotations or demonstrates hostility

towards an individual or group of people.

5. Procedure for Consideration of Appeals/Reports

6. The complainant may report any actual or suspected acts of harassment and/or discrimination.

7. An appeal/Message about actual or suspected actions of harassment and/or discrimination can be sent by the Applicant in the form indicated in the QR code, or to the mail stopharassment@railways.kz.



8. The applicant must be aware that he is responsible for the dissemination of knowingly false information provided for by the legislation of the Republic of Kazakhstan.

9. Anonymous Appeals/Reports are not subject to consideration except as provided for by the legislation of the Republic of Kazakhstan.

10. In order to consider Appeals/Messages, working groups may be created in accordance with the Company's internal documents.

The working group should consist of employees responsible for HR and social policy issues, the corporate ombudsman, and the compliance service.

11. Upon completion of the consideration of the Appeal/Message, the working group provides the authorized head of the Company with a written report on the results.

12. HR are obliged to ensure:

1) awareness of employees about responsibility when submitting Appeals/Messages.

2) explanation of this Policy to the Company's employees.

6. Final provisions

13. This Policy is subject to periodic review to ensure compliance with international standards in the field of prevention of harassment and discrimination, and the relevant norms of the legislation of the Republic of Kazakhstan.

14. The Company annually trains employees on the principles of zero tolerance for any form of discrimination and harassment.

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