

Approved

By order of the Chief of Staff

Joint-Stock Company

«National Company

«Kazakhstan Temir Zholy» from 05/12/2023 year,
№ 946 - ІІЗ

**Policy on ensuring transparency and integrity
of lobbying practices of the Joint-Stock Company
«National Company «Kazakhstan Temir Zholy» and its subsidiaries**

Version 1.0

Document group:

Operational Documentation

Policymaker:

Government Relations Department of the
branch JSC NC KTZ – «Multifunctional
service center»

Responsible for the analysis
and updating
of the document:

Government Relations Department

Astana 2023

Policy on ensuring transparency and integrity of lobbying practices of the Joint-Stock Company «National Company «Kazakhstan Temir Zholy» and its subsidiaries
Version 1.0

Content

1 Purpose and scope of application3

2 Principles of promoting the interests of JSC NC KTZ and its subsidiaries.....3

3 Practices of JSC NC KTZ and its subsidiaries5

1. Purpose and scope of application

1. The purpose of this Policy to ensure transparency and integrity of lobbying practices of the Joint-Stock Company «National Company «Kazakhstan Temir Zholy» (hereinafter referred to as JSC NC KTZ/ Company) and its subsidiaries (hereinafter referred to as the Policy) is to implement the principles of openness, integrity and ethics in the process of promoting the interests of JSC NC KTZ. The policy is aimed at preventing corruption, conflicts of interest and unfair practices related to influencing decision-making.

2. The policy was developed in accordance with the Roadmap of JSC NC KTZ to improve the ESG rating for 2023-2024, approved by the decision of the Board of JSC NC KTZ dated February 2, 2023 (Protocol No. 02/2).

3. The Policy applies to the structural divisions and subsidiaries of JSC NC KTZ.

2. Principles of promoting the interests of JSC NC KTZ and its subsidiaries

4. In order to promote the interests of JSC NC KTZ, purposeful work is being carried out with representatives of relevant government agencies on the basis of the following principles:

1) Legality: The Company and its subsidiaries, in cooperation with government agencies and international organizations, are obliged to comply with the laws of the Republic of Kazakhstan and local acts of the Company.

In order to develop international cooperation, the Company:

- pays great attention to the integration of railway transport into the international transport system, the promotion of large-scale infrastructure projects, and the development of the transport and logistics complex;

- participates in meetings along with international organizations, international transport associations, intergovernmental and interdepartmental commissions with foreign countries;

- cooperates with foreign companies in reviewing and developing documents and (or) drafting regulatory legal acts in the field of railway transport on issues affecting the interests of JSC NC KTZ;

- prevents contradiction international conventions (United Nations, International Labour Organization, Organization for Economic Cooperation and Development).

2) integrity: in their activities in the performance of official duties, employees

Policy on ensuring transparency and integrity
of lobbying practices of the Joint-Stock Company
«National Company «Kazakhstan Temir Zholy» and its subsidiaries

Version 1.0

of the Company and its subsidiaries must be committed to respecting the rights and legitimate interests when interacting with representatives of the relevant state bodies of the Republic of Kazakhstan;

3) ethics: the Company's ethics standards are aimed at strengthening trust, forming a high culture of relationships and are implemented in accordance with the Code of ethics and conduct of JSC NC KTZ and its subsidiaries (approved by the decision of the Board of Directors of JSC NC KTZ dated September 20, 2019, Protocol No. 14). When interacting with government agencies, employees must comply with generally accepted moral and ethical standards, not disseminate information that does not correspond to reality, observe etiquette, show correctness, avoid facts of rudeness, humiliation, tactlessness and incorrect behavior, and prevent actions that undermine the dignity and authority of the Company;

4) openness: The Company and its subsidiaries must ensure the honest and decent fulfillment of their official obligations;

5) honesty: consists in the conscientious performance of official duties by employees of the Company, taking into account the rights and legitimate interests of the parties, assisting them in obtaining the necessary reliable information;

6) conflict of interest: defined as a situation where contradictions arise between the personal interests of the Company's employees and officials holding a responsible public position authorized to perform public functions, in which the personal interests of these persons may lead to non-fulfillment and (or) improper performance of their official obligations;

The Policy helps to prevent or exclude situations of conflict in which the personal interest of an employee and an official of the Company affects or may affect the impartial performance of official duties.

Each employee of the Company is obliged to comply with the principles of conflict-of-interest management in accordance with the Company's Regulations, the Code of corporate governance and Business ethics, when interacting with government agencies.

7) confidentiality: when interacting with government agencies, the Company's employees must comply with confidentiality obligations, preserve the integrity and protection of information, and not distribute data that became known during work, in accordance with the List of information constituting a trade secret of NC KTZ JSC;

8) transparency: The Company provides information in the public domain, to familiarize with plans or problematic issues for planned meetings with government agencies. During conferences, briefings, and public meetings with representatives of government agencies, information is provided openly through the media and publications on the Company's official website.

3. Practices of JSC NC KTZ and its subsidiaries

Policy on ensuring transparency and integrity
of lobbying practices of the Joint-Stock Company
«National Company «Kazakhstan Temir Zholy» and its subsidiaries

Version 1.0

5. To ensure transparency and integrity of the lobbying practice of JSC NC KTZ, the following measures are applied:

1) audit: according to the regulation on the Internal audit service of JSC NC KTZ (approved by the decision of the Board of Directors of JSC NC KTZ dated May 3, 2018, Protocol No. 2), the internal audit of the Company is aimed at «finding the causes of incongruities» and improving risk management, internal control and corporate governance systems.

The external audit is carried out considering the comparison of reporting on the requirements in accordance with the legislation of the Republic of Kazakhstan.

2) training: to improve the skills of employees in accordance with the Company's Personnel Policy (approved by the decision of the Board of JSC NC KTZ dated February 2, 2023, Protocol No. 02/2), training is conducted based on developed and approved training programs;

3) development: The Company pays great attention to the development of personnel in accordance with the Rules for the organization of professional development and training (approved by the decision of the Board of JSC NC KTZ dated August 21, 2017, Protocol No. 02/22), within which scholarships and internships are provided as forms of professional development organized in order to study best practices, acquire professional practical skills in in the field of railway transport.
