

Corporate governance system policy of “Samruk-Energy” JSC group of companies

(Covering quality management, occupational health and safety, environmental protection, energy efficiency, information security, fire and industrial safety, and anti-corruption and fraud prevention)

Edition 3

“Samruk-Energy” JSC and its subsidiaries form the largest diversified energy group, comprising companies in the energy and coal industries. The Group's main activities include the production of electricity and heat, transmission and distribution of electricity, reliable energy supply, coal mining and sales, as well as the expansion and construction of new generating capacities, including renewable energy sources.

Aiming to become the leader in Kazakhstan's energy sector, creating value for shareholders, and meeting growing demand through reliable energy supplies, high-tech development, and environmental responsibility, while adhering to the principles of sustainable development, the Group makes management and investment decisions based on a variety of development scenarios, considering the views of all stakeholders. The Group also prioritizes quality management, occupational health and safety, environmental protection, energy efficiency, anti-corruption and fraud prevention, and information, fire, and industrial safety as its key operational priorities, thereby supporting and enhancing its corporate governance system.

To fulfill our Mission, achieve Samruk-Energy JSC's Vision and strategic goals, and recognizing the complexity and significance of our activities and projects, our Group commits to the following:

- Strictly adhere to all applicable norms and requirements established by the laws of the Republic of Kazakhstan, international and national standards, and apply best global practices in quality management, occupational health and safety, environmental protection, energy efficiency, information, fire, and industrial safety, and anti-corruption and fraud prevention.
- Continuously enhance operational efficiency by maintaining and consistently improving elements and processes of the corporate governance system.
- Provide safe and favorable working conditions by eliminating hazards and reducing the risks posed by dangerous and harmful production factors on the health of employees and stakeholders, making every effort to address their causes, and utilizing modern equipment, safety practices in production processes, new techniques and technologies, and collective and individual protective measures.
- Engage in consultations with employees and ensure their participation in health and safety activities, fostering long-term collaboration, as well as encouraging, developing, and disseminating best practices in occupational health and safety, fire safety, and industrial safety within the Group and among contractors.
- Effectively manage, train, and supervise contractors (subcontractors) in ensuring occupational health, fire safety, and industrial safety, particularly when operating in hazardous production facilities.
- Minimize negative environmental impacts by reducing emissions of pollutants and greenhouse gases into the atmosphere, minimizing waste generation and wastewater discharge, mitigating impacts on biodiversity, reclaiming land after facility closures, and responsibly using natural resources by adopting energy- and resource-saving, low-waste, and environmentally safe technologies, equipment, and materials.
- Take measures to adapt to climate change and compensate for potential environmental damage.
- Ensure the safe handling of production waste and implement measures for their secondary use.
- Continuously improve water resource management processes, implement water conservation and recycling projects, and assess and manage risks associated with water scarcity.
- Conduct environmental monitoring of the environment using in-house and/or independent accredited laboratories.
- Participate in research programs and industry partnerships to further knowledge accumulation and the development of innovative solutions in environmental protection, energy efficiency, rational use of natural resources, and biodiversity conservation.

- Refrain from operating in specially protected natural areas that are particularly valuable as habitats for rare, endangered, and valuable species, and conduct risk assessments when working in environmentally sensitive areas.
 - Undertake biodiversity restoration and other compensatory measures (such as greening areas, restocking water bodies, and establishing/maintaining fish protection structures) to ensure "no net loss" of biodiversity.
 - Ensure preparedness for and response to emergency situations.
 - Fulfill obligations related to mitigating the impact of solid mineral extraction, through bank guarantees or security deposits, in accordance with the requirements of Kazakhstan's legislation on subsoil and subsoil use.
 - Conduct environmental assessments of the Group's operations on the environment, including impact assessments on biodiversity, from the planning stage to decommissioning.
 - Recognize the constitutional human right to a favorable environment.
 - Improve energy efficiency in production by developing and implementing energy-saving mechanisms and enhancing energy efficiency, as well as by acquiring equipment, products, and services that use energy efficiently and improve energy performance.
 - Develop renewable energy sources.
 - Ensure continuous information protection, regardless of its form, method of dissemination, transmission, or storage.
 - Maintain transparency in the Group's operations and implement measures to prevent corruption in all its forms and manifestations during daily operations, including interactions with stakeholders.
 - Monitor compliance with anti-corruption objectives and measures through independent anti-corruption services.
 - Support proactive reporting of suspected or actual instances of corruption without fear of retaliation.
 - Strive for leadership and commitment in quality management, occupational health and safety, environmental protection, energy efficiency, anti-corruption and fraud prevention, information, fire, and industrial safety, and foster leadership and initiatives to implement advanced approaches at all levels to ensure operational efficiency and effectiveness.
 - Enhance employee engagement and awareness and their participation in quality management, occupational health and safety, environmental protection, energy efficiency, information security, and anti-corruption and fraud prevention activities.
 - Engage in consultations, collaboration, and effective communication with all stakeholders on issues related to quality management, occupational health and safety, environmental protection, energy efficiency, anti-corruption and fraud prevention, and information, fire, and industrial safety, taking into account their views and interests, and promptly informing them of key incidents and events.
 - Ensure the integrity and availability of information and sufficient resources to carry out the required activities necessary to achieve set goals.
 - Participate in the development of applicable legal acts and standards, as well as in the improvement of existing legislation on quality management, occupational health and safety, environmental protection, energy efficiency, anti-corruption and fraud prevention, and information, fire, and industrial safety.
 - Manage risks associated with our activities, including impacts on the health and safety of local populations, gender inequality, biodiversity, and cultural heritage sites.
 - Enhance corporate culture through leadership and responsibility from management, and increase knowledge in quality management, occupational health and safety, environmental protection, energy efficiency, anti-corruption and fraud prevention, and information, fire, and industrial safety.
 - Improve employee qualifications, develop a motivation system, provide social support, and create a positive socio-psychological climate within the Group.
 - Promote socio-economic development in the regions where we operate.
 - Develop partnerships, including in the field of environmental protection and biodiversity conservation, by studying best international practices for flora and fauna restoration.
 - Increase transparency and accessibility of information about the Group's activities, including annual disclosure of information in Samruk-Energy JSC's Annual Report.
 - Regularly provide reports to management on quality management, occupational health and safety, environmental protection, energy efficiency, anti-corruption and fraud prevention, and information, fire and industrial safety, and conduct regular reviews to identify ways to improve corporate governance system.
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This Policy serves as the foundation for setting and reviewing objectives and actions related to the corporate governance system and its improvement at all managerial levels.

This Policy aligns with the Development Strategy of “Samruk-Energy” JSC and acts as a tool for its implementation, considering the principles of sustainable development.

Failure to comply with the requirements of this Policy may negatively impact the Group's business performance.

Every employee in the Group recognizes and accepts responsibility for their own safety and the safety of others, having the right to halt and/or refuse to perform any operation that poses a threat to their life and health or that of those around them.

The Group's management assumes responsibility for the implementation of this Policy, providing all necessary resources and creating conditions to engage all employees in the process of maintaining and improving the corporate governance system.

All employees, as well as individuals and legal entities performing work or providing services on behalf of the Group, must be aware of these commitments and strictly adhere to them in their operations!

