



Approved by the resolution of
“Samruk-Energy” JSC Board of
Directors
dated October 29, 2021
(Minutes No. 11/21)

with amendments and supplements
approved by the resolution of
“Samruk-Energy” JSC Board of
Directors dated May 31, 2024
(Minutes No. 07/24)

**Regulations on
“Samruk-Energy” JSC Compliance Service**

SE-PSP-11/02

1. General provisions

- 1.1 These Regulations on the Compliance Service (hereinafter referred to as the "Regulations") define the status of the Compliance Service (hereinafter referred to as the "Service"), its tasks, roles, rights, and responsibilities, the main requirements for the structure of the Service, the procedure for appointing the head and employees of the Service, making decisions on imposing disciplinary sanctions against them, as well as the authority of the head of the Service and the procedure for the Service's interaction with the Board of Directors, the executive body of "Samruk-Energy" JSC (hereinafter referred to as the "Company"), the Company's subsidiaries/affiliates (hereinafter referred to as "SA"), and third parties.
- 1.2 The Regulations are based on the application of the fundamental principles of compliance in the organization's activities, Corporate Standard for the Compliance Function of "Samruk-Kazyna" JSC Group, the Code of Conduct of the Company, the Corporate Governance Code of the Company, the legislation of the Republic of Kazakhstan on combating corruption, as well as best international practices in combating corruption by the OECD.
- 1.3 The Board of Directors of the Company is responsible for determining the number of members, appointing the head and employees of the Service, and prematurely terminating their duties. These decisions are made based on the recommendations provided by the Audit Committee of the Board of Directors (referred to as the Audit Committee) subject to approval by the Compliance Service of "Samruk-Kazyna" JSC.
- 1.4 The headcount and staffing schedule of the Service are determined by the Company's staffing schedule.
- 1.5 The employment contract with the head and employees of the Service is concluded based on the decision of the Board of Directors by the head of the executive body of the Company (hereinafter referred to as the Executive Body) in accordance with the labor legislation of the Republic of Kazakhstan.
- 1.6 The procedure for the operation of the Service, the evaluation of its performance, the amount and conditions of remuneration and bonuses for the head and employees of the Service are approved/determined by the Board of Directors after preliminary consideration by the Audit Committee.
- 1.7 Social support, guarantees, and compensation payments for the employees of the Service are provided in accordance with the internal documents of the Company approved by the Board of Directors of the Company.
- 1.8 The job responsibilities, rights, and responsibilities of the head and employees of the Service are determined by job descriptions developed based on this Regulation, employment contracts, internal documents of the Company, and are approved by the Chairman of the Audit Committee of the Board of Directors

of the Company.

- 1.9 The Service, in the course of its activities, is governed by the legislation of the Republic of Kazakhstan, the Charter, decisions of the Company's bodies, the Corporate Governance Code of the Company, this Regulation, and other internal regulatory documents of the Company. The Service, in the course of its activities, applies the Basic Principles of Compliance Professional Practice, the Code of Conduct of the Company.
- 1.10 The Regulations are based on the application of the fundamental principles of compliance in the organization's activities, the Corporate Standard for Compliance Function of “Samruk-Kazyna” JSC Group of Companies , the Code of Conduct of the Company, the Corporate Governance Code of the Company, the legislation of the Republic of Kazakhstan on combating corruption, Standard regulations on anti-corruption compliance services in quasi-governmental sector entities as well as best international practices in combating corruption by the OECD.
- 1.11 The organizational structure of the Service, in accordance with the Company's staffing schedule and indicating the subordination of officials, is presented in Appendix 1 to this Regulation.
- 1.12 The Service is a structural unit of the Company, organizationally subordinate to and functionally accountable to the Board of Directors.
- 1.13 Supervision of the activities of the Service is carried out by the Audit Committee in accordance with internal regulatory documents regulating the activities of the Audit Committee. In the absence of an Audit Committee in the Company, its functions are carried out directly by the Board of Directors.
- 1.14 The Service is administratively subordinate to the Executive Body of the Company. Administrative subordination includes ensuring the head and employees of the Service with appropriate working conditions, remuneration, issuing, based on the decisions of the Board of Directors, relevant orders related to the activities of the Service, receiving reports from the Service, monitoring compliance with the work schedule, issuing orders for business trips, vacations, and other actions that do not contradict the status of the Service in accordance with this Regulation and other regulatory documents of the Company. The Executive Body should not use administrative subordination to influence the independence and objectivity of the Service.
- 1.15 The Service must be independent of the influence of any individuals in the performance of the tasks and functions assigned to it in order to ensure their proper performance and provide objective and independent judgments.
- 1.16 The independence and objectivity of the Service are ensured by complying with the requirements of the Corporate Standard for Compliance Function of “Samruk- Kazyna” JSC Group of Companies regarding the criteria for organizational independence and objectivity.

- 1.17 The Service must be impartial and unbiased in its work and must not allow conflicts of interest to arise.
- 1.18 The evaluation of the Service's activities is carried out in accordance with the requirements of these Regulations and other regulatory documents regulating the activities of the Service.

2.Goals, Objectives, and Functions of the Service

- 2.1 The Service's primary objective is to extend essential support to the Board of Directors and the Executive Body in executing their duties to attain the strategic objectives of both the Company and its subsidiaries and associated entities.
- 2.2 The fundamental aim of the Service revolves around the formulation and execution of a compliance program, the establishment of an anti-corruption policy, and the oversight of anti-corruption initiatives' implementation. This encompasses evaluating corruption risks within the Company, its subsidiaries, and affiliated entities.
- 2.3 Specific objectives, tasks, and functions of the Department are described in Appendix 2 of these Regulations.

3.The Service's rights

- 3.1. The service responsible for carrying out its core tasks and functions is entitled, in accordance with established procedures, to:
 - 1) Request and receive information and materials from other structural units of the Company, without limitation or hindrance, necessary for the execution of its functions and the resolution of tasks.
 - 2) Engage employees from other departments, in coordination with the respective department heads, to carry out planned service activities and fulfill specific directives from the management.
 - 3) Participate in programs aimed at the professional training and development of Company employees.
 - 4) Participate in the development of state programs, regulatory acts, and their implementation by making relevant suggestions within its competence.
 - 5) Prepare and submit proposals to the Company's management regarding anti-corruption measures.
 - 6) Organize and conduct meetings on matters falling within the service's purview.
 - 7) Represent the interests of the Company and/or act as its representative in state bodies and other organizations within its competence.
 - 8) Establish working groups, including representatives from the Company, to implement core tasks related to the implementation of policies against corruption and the execution of measures related to such policies.
 - 9) Conduct consultations with the Company's structural units and government authorities on matters within the service's competence.
 - 10) Use the services of compliance consultants.
 - 11) Review, coordinate, and approve documents within its competence.
 - 12) Have access to all information, including insider information and confidential information, as well as the Company's information and accounting systems, and its subsidiaries, for the purpose of carrying out its duties.
 - 13) Request and obtain documents and drafts of documents from the Company and its subsidiaries within its competence.
 - 14) Conduct interviews with Company and subsidiary management and employees.
 - 15) Participate in meetings of second-line units (risk management and internal control and third-line defense units (internal audit units), and collaborate on the exchange of

information and reports regarding conducted audits between second-line and third-line defense units.

16) Undertake other actions that are in compliance with the legislation of the Republic of Kazakhstan and the Company's internal documents.

3.2. The Head of the service possesses the following authorities:

1) Participate in meetings and events organized by the executive management of the Company and its subsidiaries on matters related to the improvement of internal control, risk management, corporate governance, and other matters within the service's competence, without requiring approval for decisions.

2) Directly communicate with the Chairman and members of the Board of Directors, Audit Committee, members of the Management Board, as well as the management of the Company's subsidiaries regarding the service's activities.

3) Report to the Audit Committee and the Board of Directors on all corrupt activities, including those involving the Company's management, the results of investigations, and instances affecting the service's independence.

4) Propose, in coordination with the Audit Committee, recommendations to the Board of Directors regarding the determination of the quantitative composition, term of authority, appointment of service employees, and premature termination of their authority, as well as the procedures of the service's operation, remuneration, and incentives for employees, and organizational and technical support for the service.

5) Initiate the convening of meetings of the Board of Directors and/or the Audit Committee and/or the Management Board on matters within the service's competence.

6) Interact with government authorities and third parties on matters pertaining to the service's activities.

7) Reallocate the responsibilities of service employees to prevent conflicts of interest and facilitate knowledge exchange (periodically or as needed).

8) Chair the commission in conducting official investigations/reviews of reports on possible corruption offenses or violations of anti-corruption legislation as the chair of the commission

9) Exercise other authorities and make decisions on all matters within the service's competence.

4. Responsibility

4.1. The Service is responsible for the implementation of the provisions stipulated in these Regulations.

4.2. The Head of the Service bears personal responsibility for the quality and timely execution of functions and tasks assigned to the Service in accordance with this Regulation, the legislation of the Republic of Kazakhstan, the Corporate Governance Code, internal documents, the employment contract, and job descriptions.

4.3. Employees of the Service, as per established procedures, are accountable for the quality and punctuality of the functions and tasks assigned to them in accordance with job descriptions, employment contracts, internal documents, and legislation of the Republic of Kazakhstan.

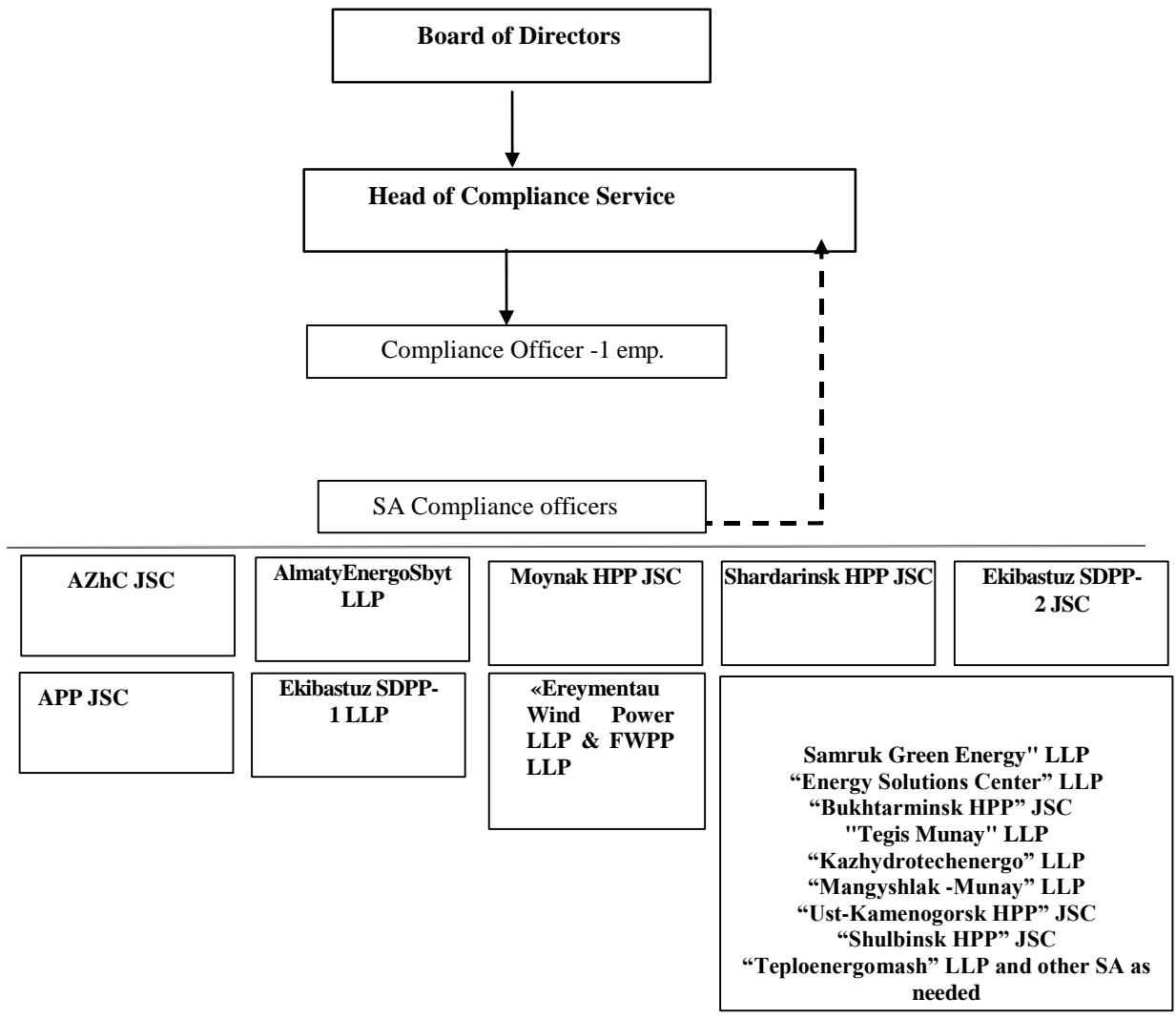
5. Service's interaction

The interaction of the Service with officials and structural units of the Company, as well

as other stakeholders is carried out by requesting and providing the necessary information, as well as resolving issues within the competence of the Service, in accordance with [Appendix 3](#). The procedure for document flow, including the purposes, frequency, and deadlines for providing information, is detailed in the "List of Document Flow of “Samruk- Energy” JSC.

Appendix 1

Organizational structure



Reporting structure —————>
 Regular reporting/escalation of matters - - - - ->

Goals, objectives and functions within the framework of compliance control carried out by the Compliance Service

Business process	Goal	Objectives	Function	Head of the Service	Compliance Officer
Compliance control of activities of the Company and its SA	Development and implementation of a compliance program, establishment of an anti-corruption policy.	determination of external regulatory requirements	conducting ongoing analysis and monitoring of external regulatory requirements and best international practices in compliance and anti-corruption matters, determining the implications for the Company in the event of regulatory changes, providing consultation, and making recommendations regarding compliance with legislation, contractual terms, and internal company procedures in compliance and anti-corruption matters.	R	P
			conducting regular internal analysis of the anti-corruption system within the Company.	R	P
			undertaking the development and monitoring of compliance with procedures for preventing conflicts of interest, manipulation, and illegal use of insider information, as well as the code of conduct and policies for preventing corruption and fraud within the Company.	R	P
			ensuring the development/updating of internal policies, regulations, and procedures of the Company related to anti-corruption efforts.	R	P
Monitoring the implementation of anti-corruption measures, including the		Conducting compliance risk assessment	conducting compliance risk assessment, providing recommendations, and determining the level of compliance risk (risk appetite).	R	P
			ensuring the disclosure of information regarding the results of compliance risk assessments in accordance with established procedures.	R	P

assessment of corruption risks within the Company and its SA		facilitating the assessment of the susceptibility of key business processes of the Company to corruption risks, including in collaboration with the regulatory authority of the Republic of Kazakhstan concerning anti-corruption measures.	R	P
	development of a compliance program, standards, and compliance policies	ensuring the optimization of communication channels for proactive disclosure to the Company in accordance with the developed proactive disclosure policy on Regulatory Requirements violations and compliance program for the Company and its SA. Ensuring the implementation of centralized compliance processes and systems within the company, conducting monitoring of the effectiveness of established compliance systems.	R	P
	implementation of a proactive reporting channel	coordinating the activities of the investigation committee, comprising members from various departments including internal auditing, risk and internal controls, legal support, human resource management, and others, with regard to inquiries received through hotline or information gathered from monitoring activities.	R	P
	communication and implementation of Compliance policies	ensuring oversight of the Regulatory compliance monitoring procedure and Compliance program.	R	P
		ensuring the preparation of regular reports on compliance risks and on the status of the compliance program to the Board of Directors, the Audit Committee, the executive body.	R	P
	observing and overseeing compliance initiatives	coordinating the investigation process until its full completion and the implementation of corrective action.	R	P
		reviewing materials submitted for consideration by the collective executive body of the Company with regard to compliance risk assessment and approval of counterparties.	R	P

			reviewing requests related to gifts and entertainment expenses for potential conflicts of interest.	R	P
			analyzing information systems and developing technical requirements for the construction of compliance systems.	R	P
			reviewing and participating in the development of compensation and incentive systems, as well as corporate governance systems within their competence.	R	P
			testing controls established to minimize compliance risks.	R	P
		engaging with regulatory authorities	facilitating interaction with regulatory authorities on anti-corruption matters (Agency of the Republic of Kazakhstan for Combating Corruption, General Prosecutor's Office of the Republic of Kazakhstan, Commission under the President of the Republic of Kazakhstan on Anti-Corruption Issues, etc.), including on conducting analysis of corruption risks and using databases for third-party due diligence.	R	P
		Methodological support on compliance matters	explaining the legislation of the Republic of Kazakhstan on anti-corruption measures to the employees of the Company and its subsidiaries, with the involvement of specialists from government agencies and public associations.	R	P
			conducting regular training for the management and employees to ensure their awareness and compliance with the anti-corruption laws and internal policies.	R	P
			providing training on compliance topics as needed and ensuring timely communication and consultation for the Company's structural units to minimize corruption risks, following the principle of proactiveness.	R	P

			ensuring the development, testing, and implementation of a procedure for verifying the reliability of contractors and third parties within the Company.	R	P
			conducting inspections of the activities of structural units and employees to assess compliance with the laws of the Republic of Kazakhstan and the Company's internal regulatory documents related to compliance and anti-corruption matters.	R	P

		Conducting checks of structural units and third-party personnel, as well as conducting compliance investigations	conducting checks on candidates for administrative and executive positions within the Company and providing a conclusion on the absence of affiliation and conflicts of interest.	R	P
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		<p>Conducting audits of organizational units and third- party personnel, as well as conducting compliance investigations</p>	<p>Monitoring and auditing the implementation of compliance policies and standards in the Company and its subsidiaries and affiliates.</p>	R	P
		<p>Monitoring the activities of compliance units, as well as compliance officers of the Company's SA</p>	<p>Reviewing materials submitted by compliance units, compliance officers of SA and providing recommendations for appointments to compliance unit positions and compliance officers at subsidiaries and affiliates.</p>	R	P

Abbreviations used for the main roles of participants in the process:

C - control;

R - responsible person;

M - member/participant;

P - performer.

The goals, tasks, and functions within the framework of business processes in which the "Compliance Service" participates

The head and staff of the Service are individually responsible for fulfilling their roles. The Service Head oversees the allocation of responsibilities among Service employees as per this Appendix.

Process/ (SU responsible for the process)	Goal of a process	Objectives of a process	Functions of the Department for Supervised Directions	Service head	Compliance officer
Board of Directors	Timely provision of high-quality materials to the Board of Directors	Information and analytical support for the members of the Board of Directors	Preparation of analytical and informational materials on the activities of the Company, the industry, and international cooperation.	R	P
		Monitoring and control of the implementation of decisions/tasks by the Chairman of the Board of Directors/Board of Directors.	Preparation of standard reports on the Service's performance.	R	P
Office of the Chairman of the Board (OCB)	Timely provision of high-quality materials to the Chairman of the Board	Information and analytical support for the Chairman of the Board	Preparation of analytical and informational materials on Compliance issues.	R	P
			Preparation of materials for presentations and meetings with the Chairman of the Board.	R	P
Document management (OCB)	Maintaining a unified procedure for working with documents and document management within the Company	Maintaining well-organized document circulation within the Company.	Managing document workflow in the SU, following the Company's Internal Regulations and File Register, which regulate document management within the Company.	R	P
			Keeping track of the use of the Company's letterheads.	R	P
			Providing suggestions for the SU's File register to compile a consolidated File register for the Company.	R	P
			Ensuring document safety and transferring them to the Company's archives.	R	P
			Monitoring and controlling the execution of control orders/documents.	R	P
Development of state language (OCB)	Compliance with language legislation and	Introducing the state language into the company's document management.	Ensuring employees have access to the company's internal regulatory documents.	R	P
			Timely uploading the provided updated Internal Regulations in pdf and word formats, required for uploading to the EDMS for processing by Company employees.	R	P
			Handling document management in the state language in compliance with the RK law "On languages in the RK"	R	P

Process/ responsible for the process)	(SU Goal of a process	Objectives of a process	Functions of the Department for Supervised Directions	Service head	Compliance officer
	implementation of a set of measures aimed at expanding the use of the state language in the company.		Involving Company employees in language training courses, particularly in the Kazakh language, and participating in all Company activities aimed at promoting and popularizing the state language.	R	P
Government Relations and Communications Management (OCB)	Organization of the interaction process with the Government and state authorities, ensuring and supporting internal and external communications.	Coordination and enhancement of relations with the Government and state authorities.	Preparing informational materials for submission to the Government and state authorities within the competence of the SU, Representative functions (advocating the interests of the Company in government bodies).	R	P
		Managing the reputation and image index of the Company	Providing informational materials in three languages (Kazakh, Russian, English) for posting on the company's website in accordance with the guidelines governing the preparation and posting of informational materials on the company's website	R	P
			Supplying information for preparing responses and interviews with the media, as requested	R	P
			Informing about events, if necessary, that require media coverage	R	P
Management of the Digital Transformation Program for the Company and its Subsidiaries and Affiliates (DTO)	Ensuring the effectiveness of the implementation of the Digital Transformation Program and the Transformation Roadmap.	Standardization and automation of business processes and conditions to ensure service quality	Providing necessary materials for coordinating and monitoring the portfolio project's activities within the Digital Transformation Program for supervised projects	R	P
			Ensuring timely provision of materials for review by the Modernization Board of the Fund within the Digital Transformation Program for supervised projects	R	P
Managing the CMS of the Company and providing methodological support for managing the management system of SA (DTO)	Ensuring the improvement of the Company's performance.	Maintaining the Corporate Management System in operational condition	Developing proposals aimed at improving operations and optimizing processes of SU and forwarding suggestions to the relevant SU	R	P
			Fulfilling the duties of an internal auditor during the audit of the Company's management system	R	P
			Participating in the internal audit of the Company's management system, coordinating reports with internal auditors	R	P
			Timely development and updating of internal regulatory documents (including instructions, rules, procedures, etc.) for supervised areas	R	P
Development, revision, and monitoring of the	Achieving the company's strategic performance indicators	Developing/updating the long-term development strategy of the Company.	Providing information during the development of the Company's development strategy	R	P
			Submitting proposals for benchmarking the Company's performance.	R	P

Process/ (SU responsible for the process)	Goal of a process	Objectives of a process	Functions of the Department for Supervised Directions	Service head	Compliance officer
long-term Development Strategy of the Company (SPandEAD)	Analysis of the Company's strategic performance indicators	Supervision and examination of the execution of the company's long-term development strategy, including corporate performance metrics	Implementing the action plan for executing the long-term development strategy of the company	R	P
Compilation and reporting on the Government Strategic Plans (SPandEAD)	Ensuring the timely and quality execution of government strategic plans.	Monitoring and controlling the execution of state strategic plans.	Executing state strategic plans (Anti-crisis plan, National Plan, "100 Steps" Plan, etc.) and providing relevant information.	R	P
Compilation and reporting on Shareholder Expectations (SPandEAD)	Achieving shareholder- defined expectations in a timely and quality manner.	Monitoring the fulfillment of shareholder expectations.	Fulfilling shareholder expectations and supplying the necessary information.	R	P
Creating Development Plans and conducting financial and economic analysis for the Company and its SA (SPandEAD).	Timely and quality planning of the company and its subsidiaries' activities in accordance with the Long-Term Development Strategy.	Development/adjustment of the Company and Subsidiaries Development Plan.	Preparing budget articles for the company in order to create and adjust the Development Plan of the company.	R	P
			Coordinating the supervised budget items for the Development Plan of subsidiaries.	R	P
	Assessing the financial and economic performance and development prospects of the company and its subsidiaries.	Monitoring and analyzing the implementation of the Company's and its Subsidiaries' Development Plan.	Coordinating the consolidated Development Plan draft sent to "Samruk- Kazyna" JSC	R	P
			Monitoring the execution of the Development Plan of subsidiaries for the supervised budget items.	R	P
Establishing and overseeing motivational Key Performance Indicators (KPIs) for the Company's management (SPandEAD)	Ensuring the effective operation of the company.	Monitoring the implementation of motivational KPIs for the Company's management.	Providing information for the preparation of the report on Key Performance Indicator (KPI) by the company's management.	R	P
Price marketing within the company (PM&CMD).	Ensuring the optimal and efficient allocation of company funds	Conducting price marketing for items in the development plan during its formation and implementation.	Supplying technical specifications when forming the company's Development Plan in accordance with the internal regulations governing marketing procedures in the company.	R	P

Process/ responsible for the process)	(SU Goal of a process	Objectives of a process	Functions of the Department for Supervised Directions	Service head	Compliance officer
			Supplying a bundle of paperwork when making purchases from a single source, following the Internal Regulatory Documents (IRD) that governs marketing procedures within the Company.	R	P
			Furnishing reports on the local content from those proposing contracts.	R	P
Carrying out and analyzing purchases within the Company (PIMD)	Ensuring the company's operations and adhering to the procurement procedures within the Company	Creating, adjusting, coordinating, and approving the Procurement Plan and Procurement Schedule.	Offering details about the plan and timetable for procuring goods, services, and works, as per the IRD that regulates the procurement process within the Company.	R	P
		Conducting procurement procedures within the company and documenting procurement decisions (tenders, competitive price proposals).	Submitting an application for acquiring GWS (Goods, Works, and Services), an approved technical specification, and an agreed-upon draft contract, in accordance with the IRD governing the procurement process within the Company.	R	P
			If necessary, ensuring the timely provision of a reconciliation report.	R	P
Managing the company's accounting and preparing the Consolidated Financial Statements (ATAD)	Compiling and providing a complete and accurate Consolidated Financial Statements for the Company and its subsidiaries.	Timely submission of primary documentation for period closure.	Providing essential accounting documents, advance reports, and accrual certificates to the responsible SU.	R	P
			Recording a copy of the finalized agreement in the 1C system within 5 days after the agreement's conclusion.	R	P
			Supplying reports that validate the purchases made.	R	P
Managing cash flow (ATAD)	Ensuring the liquidity of the Company.	Liquidity forecasting.	Creating forecasts for payments and amounts expected under concluded contracts and/or in alignment with monitored budget items.	R	P
Fulfilling obligations stipulated in the Company's guarantee agreements (ATAD)	Meeting contractual obligations and preventing potential penalty sanctions.	Timely provision of required information.	Promptly delivering information as required by guarantee agreements within established deadlines.	R	P
Publishing information about corporate events (subject to disclosure) on the FSD and KASE internet resources (TCFD)	Compliance with and monitoring of legal requirements regarding information disclosure.	Timely and accurate disclosure of information subject to disclosure.	Timely sharing of pertinent information for placement on KASE and FSD.	R	P
Human Resources Management of the Company and its SA	Ensuring the Company has qualified personnel while considering alterations in the	Administering the organizational structure.	Developing and delivering regulations on various SU within the Company	R	P
			Creating and providing job descriptions for employees of the Company	R	P
		Search and recruitment	Developing qualification requirements for candidates for vacant positions and submitting a request for personnel needs	R	P

Process/ (SU responsible for the process)	Goal of a process	Objectives of a process	Functions of the Department for Supervised Directions	Service head	Compliance officer	
	organizational structure and staffing.		Conducting interviews with candidates for vacant positions in the Company	R	P	
			Training and development	Familiarizing employees with the Internal Regulatory Documents of the Company and providing written confirmation for the creation of personnel records.	R	P
				Formulating Individual Development Plans and submitting requests for the need for professional training for employees.	R	P
				Submitting requests for participation in training events and assessment questionnaires for evaluating the effectiveness/results of completed training (from both the employee and the supervisor).	R	P
			Performance appraisal	Developing/updating individual goal maps for employees of the Company for the respective period.	R	P
				Evaluating and providing quarterly and annual performance reports for the execution of goal maps and assessment sheets.	R	P
Corporate governance of the Company's operations (CGSDD)	Enhancing the level of corporate governance within the Company	Improving the Company's corporate governance system.	Executing the Action Plan for improving corporate governance and implementing the Corporate Governance Code.	R	P	
			Providing annual and timely information regarding compliance with the provisions and principles of the Corporate Governance Code.	R	P	
		Preparing annual reports on corporate governance.	Annually and promptly providing information as part of the preparation of the annual/integrated report, based on the principles of Materiality, Completeness, Balance, Comparability, Accuracy, Clarity, and Reliability.	R	P	
Creating/updating and monitoring the Sustainability Guidelines for the Company (CGSDD)	Attaining the targets outlined in the Sustainability Guidelines for the Company	Developing, monitoring, and implementing the Sustainability Guidelines for the Company.	Providing information when formulating the Sustainability Guidelines for the Company.	R	P	
			Analyzing the performance of the indicators specified in the Sustainability Guidelines for the Company.	Monitoring and analyzing the execution of the Sustainability Guidelines for the Company.	Submitting suggestions and feedback for improving the sustainability indicators outlined for the Company's sustainable development.	R
	Developing, monitoring, and implementing the Sustainability Guidelines for the Company.	Developing, monitoring, and implementing the Sustainability Guidelines for the Company.		Executing the Action Plan for implementing the Sustainability Guidelines for the Company.	R	P
				Monitoring the implementation of the Action Plan for implementing the Sustainability Guidelines for the Company and the Action Plan for stakeholder engagement.	R	P
Ensuring economic, information, internal	Minimizing risks in the areas of economic, information, internal	Ensuring economic security within the Company	Providing information, references, documents, and written explanations during official investigations.	R	P	

Process/ (SU responsible for the process)	Goal of a process	Objectives of a process	Functions of the Department for Supervised Directions	Service head	Compliance officer
security, and civil defense (SD)	security, and ensuring civil defense.		Providing information about individuals with access to insider information within the Company	R	P
Risk management and internal control (RMICD)	Ensuring that the Authorized Body of the Company makes management decisions aimed at achieving corporate objectives in the face of uncertainty in both external and internal environments	Enhancing the corporate system of risk management and internal control (CSRMIC)	Participating in seminars, training sessions, roundtable discussions, working groups, etc., aimed at developing risk management and internal control within the Company	R	P
			Implementing action plans focused on enhancing the risk management and internal control systems	R	P
		Risk identification	Identifying and assessing risks on a regular basis	R	P
			Carrying out actions to minimize risks and providing information about the implementation of risk mitigation plans and programs	R	P
			Promptly providing information about occurred and potential risks to the department responsible for risk management, for the formation of the Company's risk database	R	P
		Developing and implementing control measures for risk management	Developing control procedures within ongoing business processes.	R	P
Carrying out control procedures within the scope of authority outlined in internal and regulatory documents of the Company	R		P		
Legal Support for the Company (LSD)	Legal protection of interests	Ensuring the compliance of conducted procedures with the RK laws	Timely submission of materials for review by the Company's Management Board, Board of Directors, drafts of orders, directives, and other internal documents, as well as other relevant documents	R	P
			Timely provision of materials for compliance assessments with the legislation of the Republic of Kazakhstan and internal Company documents.	R	P
			Timely submission of contracts for the procurement of goods, works, and services, contracts for the provision of services, memorandums, agreements, etc.	R	P
Organizing meetings of the Board of Directors of the Company (Corporate Secretary)	Making decisions within the competence of the Board of Directors	Preparing materials and information related to matters presented for review by the Board of Directors.	Providing the Corporate Secretary with materials that have been approved by the authorized body and pertain to matters presented for review by the Board of Directors	R	P
Organizing meetings of the Company's Management Board (Board Secretary)	Making decisions within the competence of the Management Board	Preparing materials and information for matters presented for review by the Management Board	Delivering approved materials to the Secretary of the Management Board for matters to be reviewed by the Management Board	R	P

Process/ (SU responsible for the process)	Goal of a process	Objectives of a process	Functions of the Department for Supervised Directions	Service head	Compliance officer
Implementation of activities on the Internal Audit of the Company and Subsidiaries and Associates (SVA)	Offering the Board of Directors independent and objective assurances and advice aimed at enhancing risk management systems, internal control, and corporate governance in the Company, its SA	Assessing and contributing to the improvement of internal control, risk management, and corporate governance systems	Supplying documents and information upon request from IAS (Internal Audit Services) as part of audit procedures	R	P
			Providing information and supporting materials on the implementation of recommendations issued by the IAS and external auditors	R	P
Enhancing the reliability and efficiency of IT infrastructure (ITD)	Establishing the required technical infrastructure for automated and information systems and ensuring their continuous operation	Carrying out activities to maintain infrastructure, support information systems, and ensure the update of hardware and communication services	Supplying information to plan and adjust the budget for the provision and updating of peripheral equipment and office equipment, software and technical maintenance, administration, and communication services within the Company.	R	P
			Submitting requests for carrying out activities to support peripheral equipment, office equipment, and information services/systems within the Company.	R	P

Abbreviations used to define the functions of the Departments:

SU- Structural unit
CMS- Corporate Management System
IRD- Internal Regulatory Documents of the Company approved by the authorized body.
KPI- Key Performance Indicators
GWS- Goods, Works, and Services
SA- Subsidiaries and Affiliates
EDMS- Electronic Document Management System
Media- Mass Media

Abbreviations used in the names of the Departments are given in accordance with the Order of the Acting Chairman of the Board dated 08.04.2021 No. 81-p “On approval of indices and symbols”:

OCB- Office of the Chairman of the Management Board
DTO- Digital Transformation Office
ITD- Information Technologies Department
SPEAD- Strategic Planning and Economic Analysis Department
PMCMD - Price Monitoring and Category Management Department
PMIDD - Price Monitoring and Inventory Management Department



Положение о Службе «Комплаенс»

СЭ-ПСП-11/02

Редакция 4

Страница 21 из 21

ATAD- Accounting and Tax Accounting Department

TCFD - Treasury and Corporate Finance Department

HRD- Human Resources Management Department

CGSDD- Corporate Governance and Sustainable Development Department

SD - Security Department

RMICD - Risk Management and Internal Control Department

LSD - Legal Support Department