



SUSTAINABILITY REPORT: ASPECT G

ANTI-CORRUPTION

The Company adheres to the principles of integrity, transparency, and accountability. Kazakhtelecom JSC and its subsidiaries, as well as all their employees, are required to comply with the anti-corruption legislation of the Republic of Kazakhstan and the principles of ethical business conduct.

MANAGEMENT APPROACH

GRI 3-3

The Compliance Service continues to operate effectively within the Company. Its primary role is to prevent and detect violations of anti-corruption legislation and internal regulations of Kazakhtelecom JSC.

The Compliance Service pays special attention to ethics, corporate conduct, and the prevention of any instances of humiliation or discrimination of employees by managers—both within the Company and its subsidiaries. In cases where such violations are identified, the Compliance Service takes appropriate measures to hold those responsible accountable. The unit enjoys the full support of the Chairman of the Management Board as well as the executive leadership of the subsidiaries.

GRI 2-23

The Company has adopted the following internal documents regulating anti-corruption compliance procedures:

- › Anti-Corruption Policy (updated in December 2024).
- › Whistleblowing Policy on Suspected Unethical/Illegal Conduct.
- › Conflict of Interest Policy.
- › Code of Business Ethics.
- › Corporate Governance Code.

GRI 205-1, 205-2

Anti-corruption efforts at Kazakhtelecom JSC are guided by the following core principles:

- › Legality of operations;
- › Transparency and openness in business activities;
- › Promotion of anti-corruption awareness among employees, partners, and clients;
- › Cooperation with government authorities, partners, and clients in the field of anti-corruption;
- › Mandatory internal investigations in response to violations of anti-corruption legislation and internal policies;
- › Protection and encouragement of individuals who contribute to anti-corruption efforts;
- › Commitment of company officials to the principles outlined in this Policy and the establishment of a “tone at the top”;
- › Inevitability of punishment for engaging in corrupt practices.





ANTI-CORRUPTION ACTIVITIES IN 2024

The key focus areas of the compliance function at Kazakhtelecom JSC in the field of anti-corruption in 2024 included:

- › conducting an initial certification audit of Kazakhtelecom JSC and its subsidiaries for compliance with the national standard ST RK

ISO 37001 “Anti-bribery management systems – Requirements with guidance for use”

- › updating the Anti-Corruption Policy;
- › performing internal corruption risk assessments;
- › employee training;
- › operating feedback channels;
- › collaboration with subsidiaries.

Between October and December 2024, a certification audit of the anti-bribery management system was conducted at Kazakhtelecom JSC to assess compliance with ST RK ISO 37001. As a result, the Company successfully passed the certification and was awarded a Certificate of Compliance with the standard ST RK ISO 37001 “Anti-bribery management systems – Requirements with guidance for use.”

As part of this certification process, a high-level assessment of anti-bribery management systems was carried out at the following subsidiaries: Kcell JSC, Vostoktelecom LLP, Digital Economy Development Center LLP, and Nursat+ LLP, resulting in “assessment reports” for each entity.

In 2024, the Company’s Anti-Corruption Policy was updated to align with the requirements of ST RK ISO 37001. The revised Policy defines and includes:

- › the Company’s goals and objectives in the area of anti-corruption;
- › core anti-corruption principles adopted by the Company;

- › legal requirements and the Company’s commitments to compliance;
- › the Company’s operational context;
- › a comprehensive set of anti-corruption prevention and response measures;
- › accountability of officials and employees for breaches of the Policy;
- › the Company’s commitment to continuous improvement of its anti-bribery management system.



In 2024, an internal corruption risk assessment was conducted for Kazakhtelecom JSC based on 2023 operations. The risk assessment covered the following areas:

- › procurement activities;
- › human resource management;
- › core business processes at Kazakhtelecom JSC.

GRI 205-1

UNITS AND BUSINESS PROCESSES SUBJECT TO CORRUPTION RISK ASSESSMENT

Indicator	2022	2023	2024
Total number of structural units assessed for corruption-related risks, units	0	7	9
Share of structural units assessed for corruption-related risks, %	0	58	75

The results of the internal corruption risk analysis, along with recommendations for their mitigation, were submitted to the Chairperson of the Management Board of Kazakhtelecom JSC. Based on the analysis, an Action Plan was developed and approved to address the causes and conditions conducive to corruption-related offenses.

In 2024, the Company issued official orders (for both the Central Administration and regional branches) identifying and approving lists of positions with a high risk of corruption offenses. These positions are subject to special, elevated requirements for appointment, including the acceptance of anti-corruption restrictions. An online training course introducing the Anti-Corruption Policy has been made available to employees on the internal learning portal: learning.telecom.kz.

GRI 205-2

COMMUNICATION ON ANTI-CORRUPTION POLICIES AND PRACTICES, 2022–2024

Category of employees	2022		2023		2024	
	Persons	%	Persons	%	Persons	%
Total number of informed members of key corporate governance bodies (General Meeting of Shareholders, Board of Directors, Management Board)	12	100	12	100	14	100
Total number of informed employees	18,662	93.4	18,662	93.4	12,651	69
Total number of informed business partners	0	0	0	0	2,022	100

GRI 3-3

No confirmed cases of corruption or bribery were recorded at Kazakhtelecom JSC or its subsidiaries during the reporting period.



ANTI-CORRUPTION TRAINING

The Company regularly conducts anti-corruption training for its employees. All new hires are required to complete a mandatory introductory online course covering the key principles of the Code of Business Ethics and the Anti-Corruption Policy.

In 2024, all heads of branches and subsidiaries held communication-based training sessions focused on anti-corruption, fraud prevention, and other compliance risks.

An online training was also conducted for seven members of the Management Board to enhance their knowledge of compliance and anti-corruption practices.

In 2024, technical training sessions were organized, covering 70% of employees across all branches and the central office.

GRI 205-2

THE NUMBER OF EMPLOYEES BY CATEGORY WHO COMPLETED ANTI-CORRUPTION TRAINING IN 2024

Category of employees	Persons	Share, %
Total number of members of key corporate governance bodies (Board of Directors, Management Board) who completed training	14	100
Total number of employees trained in anti-corruption practices by category	12,651	69
Managers	986	84
Specialists	7,433	58
Workers	4,232	95

FEEDBACK CHANNELS

GRI 2-16, 2-25, 2-27, 205-3

The mechanisms for reporting unethical or illegal behavior within Kazakhtelecom JSC are governed by the Policy on Reporting Alleged Unethical/Unlawful Conduct.

77 appeals

received on the hotline in 2024

In 2024, the Company paid a total of 16,984,565.89 tenge in administrative fines.

Kazakhtelecom JSC operates a confidential and anonymous whistleblowing hotline, which serves as an independent communication channel for reporting actual or potential violations of legislation, including fraud, corruption, discrimination, unethical behavior, and other misconduct. The hotline is administered through the parent company, Samruk-Kazyna JSC, and managed by an independent third-party operator (KPMG).

The hotline guarantees confidentiality and anonymity (at the request of the reporting individual), as well as the registration and processing of 100% of reports, followed by submission of findings to the responsible parties.

The Company ensures the confidentiality of employees, business partners, and other stakeholders who report violations within the Company and guarantees protection against retaliation and/or discrimination.

In 2024, the hotline received 77 reports, 38 of which were confirmed. All reports were investigated and classified as non-critical, and therefore communication to the Board of Directors was deemed non-essential.

Key topics of reports:

- > violations of established procedures and legislation;
- > abuse of authority;
- > labor conflicts.

GRI 3-3

The Compliance Service reviews all reports and materials received through the hotline. If there are indications of a criminal offense, the Compliance Service forwards the case to the Financial and Business Discipline Management Committee of Kazakhtelecom JSC, chaired by the Chairperson of the Management Board. The members of the committee decide whether to refer the case to law enforcement authorities.

Each case recorded by the Compliance Service is included in the quarterly report submitted to the Board of Directors. In 2024, no critical issues were identified.



The internal and corporate websites of the Company publish the contact information for the hotline and Compliance Service, which can be used to report any labor, corruption, or other types of violations.

Reporting channels for violations of the Anti-Corruption Policy:

Hotline of Samruk-Kazyna JSC

8 800 080 47 47 (free call within Kazakhstan)
8 771 191 88 16 (WhatsApp)
Internet portal: www.sk-hotline.kz
Email: mail@sk-hotline.kz
Compliance Service: 8 701 941-1001
Email: tlek.issakov@telecom.kz

Plans for 2025 and the medium term

- > Organize and conduct training sessions on compliance-related topics.
- > Ensure the timely identification and resolution of conflicts of interest.
- > Guarantee the review of 100% of reports submitted via confidential reporting channels.
- > Undergo a certification audit of Kazakhtelecom JSC for compliance with the national standard ST RK ISO 37001 “Anti-bribery management systems – Requirements with guidance for use.”