



CORPORATE ETHICS

GRI 2-23

Corporate ethics issues in Kazakhtelecom JSC are governed by the Code of Business Conduct and the Corporate Governance Code. The Code of Business Conduct and the Corporate Governance Code are public documents and are freely distributed by the Company to employees, shareholders, customers, partners, and other stakeholders.

The Code of Business Ethics of Kazakhtelecom JSC was developed in accordance with the legislation of the Republic of Kazakhstan and takes into account the requirements of the International Labour Organization, as well as the Company's Charter, Corporate Governance Code, and a number of other internal documents of Kazakhtelecom JSC.

The provisions of the Code of Business Ethics and the Corporate Governance Code are mandatory for all employees and officers of the Company.

All officers and employees are required to confirm in writing that they have read and understood the Code of Business Ethics. In addition, the Company regularly conducts training sessions for officers and employees to ensure awareness of the Code of Business Ethics, the role of the Ombudsperson, and the availability of the whistleblowing system for reporting suspected violations. In 2024, a total of 12,104 employees of the Company completed training on the Code of Business Ethics.

The Company's key principles of business ethics include:

- › Compliance with legal requirements;
- › Fairness;
- › Integrity;
- › Transparency;
- › Accountability;
- › Competence and professionalism;
- › Trust;
- › Meritocracy.

The Ombudsperson is responsible for ensuring adherence to ethical principles and resolving social and labor-related conflicts. The Ombudsperson is an employee of the Company appointed by the Board of Directors to support conflict prevention and resolution in labor relations, protect the rights and legitimate interests of employees, promote corporate values, and uphold the principles of business ethics.



RISK MANAGEMENT AND INTERNAL CONTROLS

The Corporate Risk Management and Internal Control System (CRMS and IC) is aimed at providing reasonable assurance of achieving the goals set by the governing body of Kazakhtelecom JSC.

In today's environment, emerging risks in the telecommunications sector include cybersecurity threats, changes in legislation and regulatory frameworks, as well as technological challenges such as the deployment of 5G and the Internet of Things (IoT). The increasing number of cyberattacks on communication networks poses risks of confidential data breaches, service disruptions, and significant implications for both business operations and society at large.

As the largest telecommunications operator in Kazakhstan, Kazakhtelecom JSC plays a key role in advancing telecommunications infrastructure and ensuring the security of communications across the country. The Company actively adopts modern technologies and strives to enhance the cybersecurity of its networks to protect customer data and ensure the uninterrupted delivery of communication services. These efforts are supported by the functioning of the Corporate Risk Management and Internal Control System (CRMS and IC) at Kazakhtelecom JSC, which is designed to safeguard assets, improve business processes, enhance operational efficiency, and ensure compliance with applicable legal requirements.

The timely identification of non-conformities and inefficiencies, the analysis and forecasting of potential scenarios, and the development of preventive and mitigating measures make a significant contribution to the achievement of the Company's operational and strategic objectives.