

Anti-corruption policy

1. General Provisions

1.1. This Anti-Corruption Policy (hereinafter referred to as the "Policy") has been developed in accordance with the legislation of the Republic of Kazakhstan, the Charter, and other internal documents of the Company. The Policy is the primary document that defines the tasks, principles, and directions of anti-corruption activities aimed at preventing, detecting, suppressing, and minimizing the consequences of corruption at Infratech LLP (hereinafter referred to as the "Company").

1.2. The Policy reflects the Company's and its leadership's commitment to high ethical standards in conducting open and honest business, improving corporate culture, following best corporate governance practices, and maintaining the Company's strong business reputation.

1.3. Terms and definitions used in this Policy:

Corruption – the illegal use by officials of their official (service) powers and associated opportunities to obtain or extract personal or third-party property (non-property) benefits and advantages for themselves or others, as well as bribing these individuals by providing benefits and advantages;

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Anti-Corruption Efforts – actions by Company employees within their authority aimed at preventing and suppressing corruption;

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Management – the General Director and heads of structural divisions of the Company;

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Employee – an individual employed by the Company.

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1.4. The Policy is mandatory for all Company employees. Each employee of the Company bears personal responsibility for the application and enforcement of the Policy. The Company's management is responsible for organizing all activities aimed at implementing the principles and requirements of this Policy, including forming services and appointing individuals responsible for the development of anti-corruption procedures, their implementation, and control.

1.5. The principles and requirements of this Policy apply to the Company's counterparties, representatives, employees, and other individuals when the corresponding obligations are specified in contracts with them, in their internal documents, or directly arise from the law.

2. Objectives, tasks and principles of the policy

2.1. The Company sets the following goals:

To minimize the risk of involving Company employees, regardless of their position, in corrupt activities;

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To establish a uniform understanding of the Company's Policy and a culture of rejecting corruption in all its forms and manifestations among the Company's employees and other associated individuals.

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2.2. The tasks of the Policy:

Formation of a sustainable anti-corruption behavior and responsibility among the Company's employees when performing their official duties;

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Timely detection of corruption manifestations and prevention of negative consequences;

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Identification of conditions and causes contributing to corruption offenses and elimination of their consequences;

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Improvement of the Company's operational efficiency.

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2.3. Anti-corruption efforts within the Company are based on the following fundamental principles:

Legality of activities;

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Transparency and openness of operations;

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Uniform and fair approach to all employees of the Company, regardless of their position;

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Conducting anti-corruption training and awareness programs for employees, partners, and clients of the Company;

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Cooperation in the field of anti-corruption activities with government authorities, as well as with the Company's partners and clients;

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Conducting internal investigations into all cases of violations of anti-corruption legislation and the Company's internal policies.

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3. Applicable anti-corruption definitions

3.1. "Corruption actions" are generally considered to include giving or receiving bribes, mediating in the giving or receiving of bribes, abuse of office or authority, commercial bribery, payments to simplify formalities, the illegal use of an official's position to obtain benefits in the form of money, valuables, other property, services, or rights for oneself or others, or the illegal provision of benefits or rights to such a person by others.

3.2. All employees of the Company are strictly prohibited from directly or indirectly, personally or through third parties, participating in corrupt actions, offering, giving, promising, requesting, or receiving bribes, or making payments to simplify administrative, bureaucratic, or other formalities in any form, including in the form of money, valuables, services, or other benefits, to or from any individuals or organizations, including commercial organizations, government and self-government bodies, public officials, private companies, and their representatives.

3.3. The Company and its employees are prohibited from involving or using intermediaries, partners, agents, joint ventures, or other individuals to engage in actions that contradict the principles and requirements of this Policy or the norms of applicable anti-corruption legislation.

3.4. The Company ensures the presence of procedures for checking intermediaries, partners, agents, joint ventures, and other individuals to prevent and/or identify the violations described above in order to minimize and prevent the risks of the Company's involvement in corruption.

3.5. The Company and its employees must comply with the anti-corruption laws of the Republic of Kazakhstan, as well as the principles and requirements of this Policy, in all countries around the world.

3.6. The key principles of anti-corruption established by this Policy also apply to third parties interacting with the Company.

4. Key approaches to anti-corruption activities

4.1. Verification of Counterparties The Company makes reasonable efforts to minimize the risk of doing business with counterparties that may be involved in corrupt activities. This includes assessing the counterparty's tolerance for bribery, checking the presence of their own anti-corruption procedures or policies, their willingness to comply with the requirements of this Policy, and to include anti-corruption clauses in contracts, as well as providing mutual assistance for ethical business conduct and the prevention of corruption.

4.2. Awareness and Training The Company makes this Policy publicly available in informational notices in its offices, openly declares its rejection of corruption, encourages and promotes compliance with the principles and requirements of this Policy by all counterparties, its employees,

and other individuals, and contributes to raising the level of anti-corruption culture by informing and training.

4.3. Anti-Corruption Restrictions To prevent the Company's management and employees from actions that could lead to the improper use of their powers for personal or non-official interests, the following anti-corruption restrictions apply:

Prohibition of working together with close relatives, spouses, and in-laws who are directly subordinate (close relatives: parents, children, full and half-siblings, grandparents, grandchildren; in-laws: brothers, sisters, parents, and children of a spouse);

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Prohibition of using official and other information not subject to official disclosure to obtain benefits and advantages;

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Employees and managers performing managerial functions at the Company must formally agree to accept anti-corruption restrictions, and this is documented by the HR department in writing.

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Failure to accept the anti-corruption restrictions by employees and managers may result in refusal to hire or dismissal from their position (removal from office).

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4.4. Cooperation in Anti-Corruption Efforts The Company cooperates in the field of anti-corruption with government authorities, partners, and clients on the basis of reciprocity.

4.5. Anti-Corruption Prevention Measures The prevention of corruption within the Company is carried out by:

Developing intolerance to corrupt behavior among employees of the Company;

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Conducting an analysis of corruption risks;

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Requiring partners to fulfill anti-corruption obligations and inform the Company of any violations in accordance with the signed agreements;

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Conducting ongoing monitoring of external regulatory requirements and best international practices on anti-corruption;

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Assessing the exposure of key business processes of the Company to corruption risks;

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Regularly conducting training and informing employees and third parties related to the Company on anti-corruption issues;

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Implementing mechanisms for anonymous reporting of corruption within the Company by employees and third parties.

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4.6. Interaction with Public Officials The Company refrains from paying any expenses for government officials and their close relatives (or on their behalf) in order to gain commercial advantages in specific Company projects, including expenses for transportation, accommodation, meals, entertainment, and others, or providing them with other benefits at the Company's expense.

4.7. Interaction with Employees The Company requires its employees to comply with this Policy by informing them of the key principles, requirements, and sanctions for violations. Compliance with the principles and requirements of this Policy by employees is considered when forming a talent pool for promotion to higher positions and when imposing disciplinary sanctions.

4.8. Record-Keeping All transactions of the Company that may be relevant to the implementation of the anti-corruption policy must be accurately, properly, and with sufficient detail recorded in the Company's books, documented, and available for verification.

4.9. No Retaliation and Sanctions The Company declares that no employee or third party will be subjected to sanctions (including dismissal, demotion, loss of bonus, or contract) if they report a suspected case of corruption, or if they refuse to give or receive a bribe, commit commercial bribery, or mediate in bribery, even if such actions result in the Company losing potential benefits or not gaining commercial or competitive advantages.

4.10. Gifts and Hospitality Expenses The Company develops and approves Rules that regulate the processes of giving and receiving gifts and bearing hospitality expenses.

4.11. Continuous Improvement If ineffective provisions of this Policy or related business processes are identified, or if the requirements of the applicable legislation of the Republic of Kazakhstan change, the Company's management organizes the development and implementation of an action plan to update this Policy and/or business processes.

5. Liability for failure to comply with the policy

5.1. Employees of all structural divisions of the Company, regardless of their position, bear personal responsibility for complying with the principles and requirements of this Policy, as well as for the actions (or inaction) of their subordinates that violate these principles and requirements.

5.2. Since the Company may face sanctions for the involvement of its employees, counterparties, and other individuals in corrupt activities, a service investigation will be initiated for any reasonably justified suspicion or established fact of corruption within the framework permitted by

applicable legislation.

5.3. The management is personally responsible for ensuring that the principles and requirements of this Policy are followed by subordinate employees and the division as a whole. A manager who independently identifies and informs about a corruption violation within the activities of the managed structural division or the actions of their subordinates will be exempt from responsibility.

5.4. Managers and employees who become aware of a corruption violation within their structural division must report it to the Compliance Manager. The Compliance Manager ensures the full confidentiality of the report.

5.5. Individuals found guilty of violating the requirements of this Policy may be subject to disciplinary, administrative, civil, or criminal liability at the initiative of the Company, law enforcement authorities, or other parties in the manner and for reasons specified in the legislation of the Republic of Kazakhstan, regulations, and employment contracts.

6. Final Provisions

6.1. This Policy, as well as any amendments to it, is adopted by the decision of the founders of the Company.

6.2. The Company's leaders and employees commit to carefully study, understand, and strictly follow the requirements set forth in this Policy.

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