

Appendix No. 3
to the decision of the Board of Directors
of JSC "EIC "KazakhExport" dated
November 20, 2019 No. 10

"Approved"
by the decision of the Board of Directors
of JSC "EIC "KazakhExport" dated
November 20, 2019 No. 10

The Policy
of Sustainable Development of the Joint Stock Company "Export Insurance Company
"KazakhExport"
with amendments No. 1 in accordance with the decision of the Board of Directors of the
Company dated August 27, 2022 (Protocol No. 10)

SUMMARY

The name	The policy of sustainable development of JSC "Export Insurance Company "KazakhExport
The owner	In accordance with the decision of the Board of Directors of JSC "EIC "KazakhExport" dated August 27, 2022 (Minutes № 10) the name of the structural unit is set out as follows: "Sustainability Manager".
Level of access	Publicly accessible
Measures to familiarize all employees of the Company	Email distribution within one (1) business day from the date of posting on the "Internal Portal" network drive

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Chapter 1. General provisions

Paragraph 1. Scope of Application

Paragraph 1 is redrafted in accordance with the decision of the Board of Directors of KazakhExport EIC JSC dated August 27, 2022 (Minutes No. 10):

1. This Policy of Sustainable Development of the KazakhExport Export Insurance Company Joint Stock Company (hereinafter referred to as the Policy) has been developed in accordance with the legislation of the Republic of Kazakhstan, the Charter of the KazakhExport Export Insurance Company Joint Stock Company (hereinafter referred to as the Policy - The Charter, the Company, respectively), the Corporate Governance Code of the KazakhExport Export Insurance Company Joint Stock Company and other internal documents regulating its activities, as well as taking into account the requirements of the UN Global Compact, the UN Principles of Responsible Investment, the AA 1000 Series of Standards, the ISO 26000:2010 International Standard "Guidelines on Social Responsibility", Standards Sustainability Reporting of the Global Reporting Initiative (GRI Standards).

2. The purpose of this Policy is to define the fundamental norms, principles, rules and approaches to be followed by the Company in building a sustainable development management system.

3. Objectives of this Policy:

1) to define the principles and directions of the Company's activities in the field of sustainable development, including in terms of creating an effective and transparent system of interaction with stakeholders;

2) to consolidate the roles, competencies, responsibilities of each body and all employees of the Company for the implementation of the principles of sustainable development;

3) to determine the relationship between sustainable development and key processes of Society.

4. In implementing its sustainability objectives, the Company adheres to the main provisions of its Development Strategy, as well as international norms of conduct and principles set forth in international sustainability standards.

5. The Company considers the use of international standards in the field of sustainable development as a necessary condition for ensuring compliance of its activities with the best international practice and achieving goals and objectives in the field of sustainable development.

6. The provisions of this Policy must be observed by all employees of the Company in the part affecting interaction with interested parties when planning and implementing their activities, developing internal regulatory documents, distributing information and other types of communication.

7. The following basic terms, definitions and abbreviations are used in this Policy:

1) The UN Global Compact is the largest international initiative in the field of sustainable development, the purpose of which is to introduce into the activities of the business community ten basic principles in the field of human rights, labor relations, environmental protection and anti-corruption;

2) Officials - members of the Management Board and the Board of Directors of the Company;

Subparagraphs 3) and 4) of paragraph 7 are deleted in accordance with the decision of the Board of Directors of KazakhExport EIC JSC dated August 21, 2022 (Minutes No. 10):

5) The sole shareholder is JSC "National Managing Holding "Baiterek";

6) interested party (stakeholder) - individuals and legal entities or groups of persons who influence the Company and its activities and/or are influenced by the Company (for example, employees, customers, contractors, etc.);

7) The Development Index is a tool for prioritizing potential projects when making a decision by the authorized bodies of the Company to provide insurance and/or financial support in accordance with the Company's Development Strategy, state development programs and/or the goals of the Company's investment activities, the Sole Shareholder, calculated in accordance with the internal documents of the Company, agreed with the Sole Shareholder;

8) Card of stakeholders - a document and one of the ways of the Company, which allows to systematize

and visualize information about the environment of the Company in order to develop an adequate strategy for working with each of the stakeholders;

9) KPI - key performance indicators;

10) Committee - Strategic Planning Committee of the Board of Directors;

11) competitors - individuals or legal entities whose field of activity, interests and goals are identical in the field of activity, interests and goals of the Company;

12) counterparties - individuals or legal entities that have assumed certain civil obligations (for example, suppliers, partners under concluded contracts, agreements, etc.);

13) the concept of a "green office" is an integrated approach that includes both technical and motivational and educational activities aimed at increasing the level of environmental awareness of employees;

14) International Standard ISO 26000:2010 "Guidance on Social Responsibility" - a standard that defines the principles of social responsibility, the main topics and issues related to social responsibility and how to integrate socially responsible behavior into the strategies, systems, practices and processes of the organization;

15) The International Finance Corporation is an international financial institution, part of the World Bank Group, which focuses exclusively on the private sector of developing countries;

Subparagraph 16) of paragraph 7 is redrafted in accordance with the decision of the Board of Directors of KazakhExport EIC JSC dated August 27, 2022 (Minutes No. 10):

16) Sustainability KPI - a set of key parameters that are used by the management body to track and diagnose the company's performance within the framework of sustainable development and subsequent adoption of management decisions based on them;

17) management body - the Board of Directors of the Company;

18) United Nations - United Nations Organization;

19) UN PRI Principles - a set of principles based on consideration of environmental and social factors, as well as factors of good corporate governance (ESG factors) at all stages of investment activities;

20) the precautionary principle - the principle implies the adoption of effective measures to prevent environmental degradation, preventive actions to prevent environmental disasters, even in the absence of their full scientific justification;

21) AA1000 series of standards - a set of tools and standards for non-financial reporting management and quality assurance, developed by the Account Ability Institute (Institute for Social and Ethical Reporting).

The AA1000 series of standards includes:

AA1000 Accountability Principles Standard (AA1000APS);

AA1000 Verification Standard (AA1000AS);

AA1000 Stakeholder Engagement Standard (AA1000SES);

22) Sustainability Reporting Standards of the Global Reporting Initiative (GRI - Global Reporting Initiative Standards) - a set of standards that includes 3 universal standards, applicable to all organizations and including principles and requirements for reporting, general elements of disclosure and information about the approach of officials and management body and 33 thematic standards, containing a series of standards for the disclosure of economic, environmental and social topics;

23) sustainable development - development in which the Company manages the impact of its activities on the environment, economy, public relations and makes decisions taking into account the interests of interested parties. Sustainable development should meet the needs of the current generation without depriving future generations of the opportunity to meet their needs;

24) ESG (Environmental, Social and Governance) factors - a set of principles of environmental efficiency and environmental protection, social orientation and good corporate governance, based on standards recognized by the international community;

25) UN Sustainable Development Goals - 17 goals and 169 targets adopted under the 2030 Agenda for Sustainable Development aimed at eradicating poverty, preserving the planet's resources and ensuring prosperity for all.

Paragraph 2. Sustainable Development Goals and Objectives

8. The sustainable development of the Company includes a set of principles and obligations that guide the Company in carrying out its activities, in part:
 - 1) managing relationships with stakeholders;
 - 2) assessment and management of the impact on the national economy, social sphere and ecology.
9. The Company ensures consistency of its economic, environmental and social goals for sustainable development in the long term.
10. The economic component of the sustainable development of Society contains the following objectives:
 - 1) break-even of the Company's activities;
 - 2) ensuring the interests of the Sole Shareholder;
 - 3) improving the efficiency of processes;
 - 4) promoting the development of non-resource economy, including the growth of exports of non-resource industries and goods.
11. The ecological component of the sustainable development of Society contains the following goals:
 - 1) Minimizing impacts on biological and physical natural systems;
 - 2) optimal use of limited resources;
 - 3) application of environmentally friendly, energy- and material-saving technologies.
12. The social component of the Company's sustainable development includes the following:
 - 1) ensuring transparent competitive procedures and equal employment opportunities;
 - 2) fair remuneration and respect for the rights of employees;
 - 3) ensuring occupational safety and health of employees;
 - 4) training and professional development of employees;
 - 5) implementation of internal and external social programs.
13. The Company's objectives in the field of sustainable development are:
 - 1) Integration of sustainable development principles into the Company's activities;
 - 2) analysis of activities and control of risks in the context of the three components of sustainable development;
 - 3) improving the quality of management of sustainable development through the organization of systemic work;
 - 4) creation of mechanisms for effective interaction of Society with stakeholders, including regular information on the results of activities in the field of sustainable development.

Paragraph 3. The principles of sustainable development

14. Within the framework of its activities, the Company shall be guided by the principles of sustainable development set forth in the Company's Corporate Governance Code.
15. The Society also declares its commitment in its activities to the principles of the UN Global Compact, which are based on the Universal Declaration of Human Rights, the Declaration of Fundamental Rights and Principles at Work of the International Labour Organization, the Declaration on Environment and Development:
 - 1) in the field of human rights protection:
Society ensures and respects the protection of human rights proclaimed at the international level;
 - 2) in the field of labor relations:
The Society supports and recognizes the right to collective bargaining;
The Society opposes the use of forced and child labor, discrimination in labor and employment;
 - 3) in the field of environmental protection:
The Society supports a precautionary approach to environmental issues;
The Society undertakes initiatives aimed at increasing environmental responsibility;

The Society strives to promote the development and dissemination of environmentally friendly technologies and the implementation of the "green office" concept.

4) in the area of combating corruption:

The Society declares zero tolerance for all forms of corruption and other unlawful acts, including extortion and bribery.

Paragraph 4. Interaction with Stakeholders

16. In order to implement a successful and effective sustainable development policy in Society, due attention is paid to interaction with stakeholders.

17. In order to determine the list of stakeholders, the degree of their influence and spheres of influence on the interests of the Company, a Map of the Company's stakeholders has been developed.

18. When assessing the importance of stakeholders, the Company ranks stakeholders according to two factors: the degree of support/opposition of the stakeholder, assessment of the strength of his influence on the Company.

19. Based on the assessment of the importance of stakeholders, the structural divisions of the Company determine the directions of interaction with stakeholders, depending on the specifics of the activity.

20. The main forms of interaction with stakeholders are: joint programs and projects, memoranda of cooperation, joint working groups, activity reporting, meetings, meetings, publications, interviews, etc.

21. The main areas of interaction with stakeholders are: strategic planning, financial activities, project management, supply of goods, works and services, lawmaking, operational activities, interaction with the media.

22. The process of organizing the Company's interaction with stakeholders is based on the principle of involvement, which implies taking into account the interests of stakeholders at all stages of the Company's management process and involving stakeholders in the discussion of significant topics and important issues, potential risks and limits of responsibility.

23. In turn, engagement is achieved by observing the following three principles:

1) materiality.

The Company clearly defines its stakeholders and is aware of which stakeholders' interests are essential.

2) completeness.

In the course of its activities, the Company pays attention to the concerns of interested parties, namely, understands their views, needs and expected results of activities, as well as opinions on significant issues.

3) responsiveness.

The Society is consistently responsive to all significant stakeholder issues.

24. In order to organize the management of relationships with stakeholders, the Company focuses its activities on the following basic principles:

1) respects and takes into account the interests of all stakeholders;

2) seeks to actively inform target audiences about its activities;

3) ensures objectivity, reliability, independence and a high level of information transparency in the implementation of state programs, certain internal procedures (procurement, competitive selection among external candidates for employment, the provision of financial and non-financial services), as well as the use of financial resources;

4) ensures open and productive cooperation with all stakeholders;

5) Fulfills its obligations to stakeholders;

6) receives feedback from stakeholders on a regular basis.

25. When formalizing approaches to managing the impact on stakeholders, the Company proceeds from the need to comply with the requirements defined below.

26. When interacting with the Sole Shareholder and authorized state bodies of the Republic of Kazakhstan:

- 1) The Company provides reliable information on the results of its financial and economic activities in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and internal documents of the Company;
- 2) The Company ensures implementation of the Sole Shareholder's rights within the framework of corporate governance principles, aimed at effective adoption of key decisions;
- 3) The Company provides additional information on plans, achievements, problems of activity, as well as researches of other organizations about activity of the Company except for confidential information received from other organizations within contracts and/or agreements on information disclosure and/or confidentiality;
- 4) The Company participates in international ratings in the field of sustainable development, credit ratings.

27. When interacting with partners:

- 1) The Company sufficiently discloses up-to-date information about its financial condition, dividend policy and credit history, as well as its development prospects;
- 2) the Company's financial and management reports are prepared and provided in a timely manner in accordance with legislative and regulatory requirements;
- 3) The Company carries out proactive communication of approaches to making investment and strategic decisions;
- 4) The Company faithfully fulfills its contractual obligations to business partners;
- 5) The Company ensures information transparency, openness, equality, fairness, absence of discrimination and unreasonable restrictions on competition in strict accordance with the legislation of the Republic of Kazakhstan;
- 6) The Company observes the principles of corporate governance and improvement of the corporate governance system in accordance with the world's leading practice;
- 7) The Company does not allow unfair competition with regard to its competitors.

28. When interacting with customers:

- 1) the Company's services are accessible to consumers;
- 2) The Company ensures the safety of customer data and other legally protected information in order to protect their leakage and misuse;
- 3) The Company provides services of the same quality and the same level of service without discrimination to all its customers;
- 4) The Company promotes the improvement of the quality of service and service to its customers;
- 5) The Company informs customers about new tools and operating principles on a regular basis.

29. When interacting with employees:

- 1) The Company provides an open, transparent personnel policy aimed at forming qualified and motivated personnel;
- 2) The Company provides all employees with equal opportunities to realize their potential in the course of their work, an impartial and fair assessment of their activities;
- 3) the selection and career development of employees in the Company is carried out solely on the basis of professional abilities, knowledge and skills;
- 4) effective communication and interaction of employees is provided by organizing internal corporate sources of regular information of employees and communication channels, regular study of opinions and suggestions of employees, organizing the activities of working groups.

30. When interacting with the public:

- 1) the Company efficiently and promptly interacts with the media and the public;
- 2) the responses to inquiries sent to the Company are provided in a timely manner and in full;
- 3) the Company organizes regular meetings with the public (round tables, briefings, placement of general information on its activities in the public domain) to discuss the implementation of programs, exchange opinions;
- 4) The Company shall implement social projects taking into account legislative and other regulatory requirements and in accordance with the procedure stipulated by its internal documents.

Chapter 2. Directions of the Company's activities in the field of sustainable development

Paragraph 1. Promotion of sustainable development of the national economy

31. The mission of the Company is to promote sustainable economic development of the Republic of Kazakhstan as part of the implementation of relevant government programs and strategies.

32. The Company, being one of the key national companies, participates in supporting the growth of export of non-resource goods, works, services in the priority sectors of the economy and forming the practice of financial, insurance and non-financial support of Kazakhstani enterprises and organizations.

33. The key tasks that the Society accomplishes as part of its mission are:

1) Promotion of export of non-resource goods, works and services of the Republic of Kazakhstan through insurance and reinsurance of risks;

2) Encouraging the export of non-resource commodities in accordance with the legislation of the Republic of Kazakhstan by insuring and re-insuring risks;

3) stimulating investments in the Republic of Kazakhstan and abroad by insuring and re-insuring risks;

4) insurance of financial risks related to the export of goods;

5) Encouraging exports by insuring risks of second-tier banks on pre-export and post-export operations;

6) stimulation of export of goods, works and services by means of conditional placement of funds in the second-tier banks for the purposes of pre-export and trade financing of export operations;

7) reinsurance activities within the framework of the core activity by accepting and transferring risks for reinsurance to Kazakhstani and foreign insurance (reinsurance) organizations.

34. The Company carries out active work to promote financial and insurance instruments on both domestic and foreign markets.

35. In order to achieve the goals of cost-effective and sustainable activities, the development of responsible investment practices in accordance with the main international standards in this area - the UN Principles of Responsible Investment, the Company strives to adopt international best practices, including the practice of the International Finance Corporation in environmental and social issues, as well as in corporate governance (ESG factors) within the framework of projects receiving financial and insurance support of the Company.

36. The Company strives to introduce and integrate ESG factors and a project prioritization tool, the Development Index, into the decision-making process for providing financial and insurance support, including by familiarizing the Company's counterparties with ESG factors and the Development Index.

37. The Company expects its counterparties to:

1) application of the environmental risk management system (environment) to identify, assess the actual and possible impacts on the environment and society, identify and effectively implement appropriate management measures, control and the level of environmental risks;

2) the application of a human resource management system and ensuring (preserving) the health of employees, which should be based on respect for the rights of employees, including freedom of association and the right to conclude collective agreements; this system should ensure fair treatment of employees, the creation of safe and healthy working conditions for them, the prevention and prevention of adverse effects on health and safety of population groups and consumers;

3) the application of a system of good corporate governance based on the principles of fairness, honesty, responsibility, transparency, professionalism and competence; good corporate governance implies respect for the rights and interests of all persons interested in the organization's activities and contributes to its successful operation, including the growth of its market value, maintaining financial stability and profitability.

Paragraph 2. Managing own environmental impact

38. Due to the nature of its activities, the Company does not have a direct significant impact on the environment. The main resources consumed by the Society are electricity, thermal energy and water.

39. The Company applies principles and methods of rational use of resources that best ensure the prevention of adverse environmental impacts.

40. In its activities, the Company strives to reduce the excessive consumption of resources and minimize the existing negative environmental impact through the introduction of energy-efficient technologies, reduce water consumption, reduce paper consumption for office needs through the introduction of an electronic document management system and the practice of double-sided printing, as well as the implementation of the "green office" concept.

Paragraph 3. Responsible work practice

41. Employees are the main value and the main resource; the results of the Company's activity directly depend on the level of their professionalism and safety.

42. The Company builds labor relations with its employees based on the principle of legality and observance of generally recognized labor rights of the employee.

43. In carrying out its activities, the Company is guided by the principle of equal opportunities and does not discriminate against its employees in hiring, remuneration, access to training, promotion, dismissal on grounds such as gender, ethnicity, language, religious, political and other beliefs, citizenship, national or social origin, limited capabilities.

Paragraph 44 is set out in the wording in accordance with the decision of the Board of Directors of JSC "ESC "KazakhExport" dated August 27, 2022 (Protocol No. 10):

44. The structural division of the Company responsible for human resource management uses an extensive set of channels for the search and selection of personnel to attract the most qualified candidates.

45. The Company operates a system of continuous training and development of personnel using proven technologies and information management systems.

46. The Society uses advanced forms of education - training internships, coaching, case studies, brainstorming, etc.

47. Training and professional development of the Company's employees is based on the following principles:

1) compliance of the topic and content of training activities with the needs defined in accordance with the official duties of the employee, the results of the evaluation of his performance efficiency goals and objectives set for the employee;

2) the focus of training activities on solving specific tasks that ensure the improvement of the efficiency of the Company's activities, the study of the best corporate practices and standards;

3) systematic, applied, planned nature of training and professional development;

4) coverage of the maximum possible number of employees of the Company with training and professional development programs.

48. The training process in the Company is built on the basis of regular performance evaluation and assessment of employees' competencies.

49. The level of employee productivity is increased through a fair and systematic evaluation of activities by applying KPI, personnel appraisal and motivational measures.

50. In order to ensure fair and competitive remuneration, the Company has introduced a grading system, regularly reviews salaries on the market and in a comparable industry, and conducts motivational studies.

51. The Company takes measures to ensure proper organization of labor of employees in the workplace and strives to create safe working conditions that meet the requirements of the legislation of the Republic of Kazakhstan in this area.

52. The Company complies with the requirements of the legislation of the Republic of Kazakhstan on the need to document and investigate all incidents and problems related to occupational health and safety in order to minimize or eliminate them.

53. The Company provides the necessary training for employees in the field of occupational health and safety, including training and professional development of employees in this area.

Paragraph 4. Responsible work practice

54. The Company identifies risks of corruption and implements and supports policies and practices that counteract corruption.

55. Managers at all levels of the Company set an example of anti-corruption behavior to their subordinate employees and demonstrate commitment, encouragement and oversight of the implementation of anti-corruption policies.

56. The Company raises awareness of its officials, employees, counterparties on corruption and anti-corruption issues.

57. The Company conducts regular training on anti-corruption and anti-fraud issues for its employees.

58. The Company has feedback mechanisms through which officials, employees and counterparties of the Company, as well as individuals and legal entities can provide information about possible corruption offenses committed by any official, employee of the Company, official, employee, representative of the counterparty of the Company.

59. The Company's officials and employees are responsible for making transparent, timely and adequate decisions free from conflicts of interest.

Chapter 3. Mechanisms for the implementation of this Policy

Paragraph 1. Distribution of responsibility

60. The management of sustainable development in the Company is carried out within the framework of the general management system of the Company's activities and is an integral part of it.

61. The Management Board of the Company ensures the formation of an appropriate system in the field of sustainable development and its implementation.

62. The Board of Directors of the Company exercises overall strategic management and control over the implementation of sustainable development.

In accordance with the decision of the Board of Directors of JSC "EIC "KazakhExport" dated August 27, 2022 (Minutes № 10), paragraph 63 is deleted.

64. The Management Board of the Company approves the relevant action plan in the field of sustainable development and monitors its implementation.

Paragraph 65 is set out in the wording in accordance with the decision of the Board of Directors of JSC "EIC "KazakhExport" dated August 27, 2022 (Protocol No. 10).

65. An employee engaged in planning activities in the field of sustainable development of the Company ensures monitoring and coordinates the proper implementation of measures in the field of sustainable development by structural divisions of the Company.

Paragraph 66 is redrafted in accordance with the decision of the Board of Directors of KazakhExport EIC JSC dated August 27, 2022 (Minutes No. 10).

66. The heads of the relevant structural divisions of the Company involved in the implementation of the action plan in the field of sustainable development and measures ensuring the achievement of efficiency in the field of sustainable development bear personal responsibility for the implementation of measures and the achievement of efficiency in the field of sustainable development within their competencies.

Paragraph 67 is set out in the wording in accordance with the decision of the Board of Directors of JSC "ESC "KazakhExport" dated August 27, 2022 (Minutes No. 10).

67. An employee engaged in planning activities in the field of sustainable development of the Company

performs the following tasks in the field of sustainable development of the Company:

1) carries out planning of activities in the field of sustainable development of Society, analysis of the internal and external situation, definition of goals, as well as targets in the field of sustainable development;

Subparagraph 2) of paragraph 67 is set out in the wording in accordance with the decision of the Board of Directors of KazakhExport EIC JSC dated August 27, 2022 (Minutes No. 10).

2) together with the structural divisions of the Company develops efficiency measures in the field of sustainable development and ensures their subsequent submission for approval by the Management Board of the Company;

Subparagraph 3) of paragraph 67 shall be redrafted in accordance with the decision of the Board of Directors of KazakhExport EIC JSC dated August 27, 2022 (Minutes No. 10).

3) together with the structural divisions of the Company develops an action plan in the field of sustainable development with subsequent submission for approval by the Management Board of the Company;

4) collects information from the structural divisions of the Company on the implementation of the provisions of this Policy, the approved action plan in the field of sustainable development and prepares and submits a summary report to the Management Board of the Company based on the results of each quarter of the calendar year;

5) carries out interaction and coordination with the structural divisions of the Company and the Sole Shareholder to achieve the goals and objectives of this Policy;

Subparagraph 6) of paragraph 67 shall be redrafted in accordance with the decision of the Board of Directors of KazakhExport EIC JSC as of August 27, 2022 (Minutes No.10).

6) at least once a year, prepare a report of the Management Board of the Company for the Committee and the Board of Directors on the implementation of the provisions of this Policy;

7) provide complete and reliable information on the implementation and rationalization of sustainable development, the provisions of this Policy to be included in the annual report of the Company;

Subparagraph 8) of paragraph 67 is set forth in accordance with the decision of the Board of Directors of KazakhExport EIC JSC dated August 27, 2022 (Minutes No. 10).

8) together with the structural subdivision of the Company responsible for human resource management, organize training seminars and trainings for officials and employees of the Company in order to improve their skills in the field of sustainable development in accordance with the internal documents of the Company;

9) interact with foreign and international organizations on sustainable development issues;

10) in accordance with the procedure determined by the Company's internal documents, regularly post information on the results of implementing this Policy in the relevant section of the corporate website;

11) perform other tasks necessary for the successful implementation of this Policy.

Paragraph 68 is set forth in a wording consistent with the decision of the Board of Directors of KazakhExport EIC JSC of August 27, 2022 (Minutes No. 10).

68. Based on the results of each quarter of the reporting year, the Company's business units shall provide, upon written request, information on the results of implementation of the sustainability action plan, as well as suggestions (if any) for improving the Company's activities in this area to the employee responsible for planning activities in the field of sustainable development of the Company.

Paragraph 2. Integration of sustainable development principles into key processes

69. The Company strives to integrate sustainability principles into the Company's Development Strategy and the Company's key processes, including planning, reporting, risk management, investments, operations and others, as well as into decision-making processes at all levels, beginning with the Company's bodies and ending with employees.

Paragraph 3. Decision making processes

70. The decision-making process in the Company is based on:

- 1) commitment to the principles of sustainable development established by the authorized bodies of the Company;
- 2) a decision-making process that promotes the efficient use of financial and human resources;
- 3) equal gender and ethnic opportunities for leading positions provided by the Company;
- 4) implementation of bilateral information exchange processes in the Company with interested parties, which will help to identify areas for improvement of interaction;
- 5) the necessity to periodically analyze and evaluate management processes in the Company, as well as communicate the relevant information to all stakeholders.

Paragraph 4. Corporate governance

71. The Company's sustainable development management system is inextricably linked to the corporate governance system.

72. One of the fundamental principles of the Company's Corporate Governance Code is the principle of sustainable development.

All employees and officers of the Company at all levels contribute to its sustainable development.

Paragraph 5. Operational activities

73. The choice of suppliers of goods, works and services is made by the Company on a transparent basis in accordance with the legislation of the Republic of Kazakhstan and internal documents, and is based on the preference of the best price, quality and terms of supply of goods, works and services, as well as good business reputation of the counterparty.

74. The Company considers the possibility of including the principles of sustainable development in relevant civil law transactions (agreements, contracts) with partners to improve consistency with the goals of sustainable development.

Paragraph 6. Risk management and internal control

75. The Company's actions affect the interests of stakeholders and may be subject to criticism from them. Criticism of stakeholders is considered by the Company as a source of possible negative impact on its reputation. The main type of the Company's risk in the field of sustainable development is the reputational risk associated with a decrease in the level of trust of the target audience in the Company's activities.

76. The Company strives to use as one of the tools to manage reputational risk - continuous dialogue with stakeholders, including media monitoring, consideration of appeals, surveys and meetings with stakeholders.

77. Other risks defined by the Company's internal documents may be considered as other risks affecting the Company's sustainable development in the long term.

78. In order to identify sustainability risks, the Company shall analyze both internal and external factors affecting the Company.

79. The Company includes the risks affecting the achievement of strategic goals in the risk register. The

Company's structural divisions also develop action plans to manage and minimize risks in accordance with the procedure stipulated by the Company's relevant internal regulatory documents on risk management.

80. To ensure effective internal control over the Company's financial and economic activities, the Management Board and the management body of the Company approved the relevant policies, procedures, standards of conduct and actions, methods and mechanisms of internal control aimed at achieving the Company's goals and minimizing the risks in the course of its activities.

Paragraph 7. Financial support

81. The Company provides financial and insurance support in the following areas:

- 1) Provides exporter protection against the risk of non-fulfillment of financial obligations by a foreign counterparty when selling its goods / works / services for export with the condition of deferred payment;
- 2) Financing exporter to replenish working capital to produce exported goods or perform works and services for export;
- 3) Provides an opportunity to obtain alternative financing in the form of advance payments from foreign counterparties, necessary to replenish working capital for the production of export products or performance of works and services for export.
- 4) protection of holders of bonds issued by exporters against the risk of default;
- 5) other financial and insurance support according to internal documents of the Company and state programs in which it participates.

82. The Company does not provide financial and insurance support for the activities prohibited by the legislation of the Republic of Kazakhstan.

83. When implementing joint projects with international financial organizations, including with the International Financial Corporation, the Company does not provide financial and insurance support for activities prohibited by the mentioned organizations.

Paragraph 8. Disclosure of information in the field of sustainable development

84. This Policy shall be open to the general public and shall be posted on the Company's corporate website.

85. The Company shall regularly disclose the results of implementation of this Policy to the stakeholders in the relevant section of the corporate Internet resource, as well as in the Company's annual report.

86. When preparing the annual report, the Company also uses the international information disclosure standards - GRI Standards.

Chapter 4. Final provisions

87. This Policy comes into effect from the date of its approval by the Board of Directors of the Company.

88. The Company strives to implement the provisions of this Policy in its activities.

89. The Company will improve this Policy taking into account changes in the legislation of the Republic of Kazakhstan and the emergence of new standards in the field of sustainable development in international and national practice, taking into account the interests of the Sole Shareholder and other interested parties.