

"APPROVED"
by decision of the
Board of Directors of
JSC "ESC "KazakhExport"
dated May 31, 2019
(Protocol No. 5)

CODE OF BUSINESS CONDUCT
of the Export Credit Agency of Kazakhstan Joint Stock Company
(subject to changes as of February 28, 2025)

Astana, 2019

SUMMARY OF IRD

Name of the IRD	The Code of Business Conduct of the Export Credit Agency of Kazakhstan Joint Stock Company
Owner of the IRD	Department of Human Resource Management and Operations
Access level	Publicly available
Measures to familiarize all employees of the Company with the IRD	E-mail distribution within 1 (one) business day from the date of posting the IRD on the Internal Portal network drive
Details of the decision on the approval of amendments/additions	Decision of the Board of Directors of the Export Credit Agency of Kazakhstan dated 02/28/2025 No. 3

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Chapter 1. General provisions

1. This Code of Business Conduct (hereinafter referred to as the Code) of the Export Credit Agency of Kazakhstan Joint Stock Company (hereinafter referred to as the Company) has been developed in accordance with the provisions of the legislation of the Republic of Kazakhstan, the Charter and internal regulatory documents of the Company, taking into account recognized international standards of business conduct and corporate governance and is a set of rules that establish fundamental values and principles business conduct, moral and ethical norms and rules of conduct that every employee of the Company should follow.

2. This Code applies to all employees of the Company.

3. The objectives of this Code are:

- 1) development of a unified corporate culture based on high ethical standards;
- 2) the consolidation of fundamental values and principles, norms of business conduct and behavior, which should guide all employees of the Company in their activities, both when making strategically important decisions and in everyday situations;
- 3) maintaining an atmosphere of trust, mutual respect and decency in Society;
- 4) building effective interaction with stakeholders through the application of best business conduct practices.

The Code reflects the activities of the Company's employees in terms of the application of standards of business conduct and business conduct.

Chapter 2. Basic concepts and terms

4. The following definitions are used in the Code:

1) Business conduct is a set of moral principles and norms of business conduct that should guide the Company's officials and employees in their activities;

2) Officials – member of the Board of Directors, members of the Management Board of the Company;

3) The sole shareholder is Baiterek National Managing Holding Joint Stock Company;

4) Interested party is a person whose rights are provided for by the legislation of the Republic of Kazakhstan and the Charter of the Company and are related to the Company's activities;

5) Conflict of interest is a situation in which there is a conflict between the personal interests of an employee and/or an official of the Company and the proper exercise of their powers or the legitimate interests of the state, the Sole Shareholder, the Company, individuals and legal entities, which can lead to harm to these legitimate interests;

6) The Ombudsman is a person appointed by the Board of Directors of the Company, whose role is to advise the Company's employees who have contacted him, and to assist in resolving disputes, conflicts, problematic issues of a social and labor nature, as well as in observing the principles of business conduct by the Company's employees;

7) Partners are the Company's clients, persons providing assistance and assistance in the Company's activities, as well as suppliers of goods, works and services for the needs of the Company;

8) An employee is a person who is in an employment relationship with the Company and directly performs work under an employment contract or an outsourcing contract;

9) The Company's reputation is the prevailing public opinion about the advantages and disadvantages of the Company's activities, the behavior of officials and employees of the Company;

Paragraph 4 was supplemented by subparagraph 10) in accordance with the decision of the Board of Directors of the Company dated February 28, 2025 (Minutes No. 03)

10) harassment is a person's behavior that causes inconvenience or even harm to another person, violates personal boundaries and subordination, harassment, humiliation and violations of privacy.

Chapter 3. Mission, principles, values

5. The provisions of this Code have been developed taking into account the mission and values of the Company. The Company's mission is to support the growth of exports of non-primary

goods, works, and services in priority sectors of the economy and to form the practice of financial and insurance support for Kazakhstani enterprises.

6. The fundamental values and principles of the Society are:

1) meritocracy – recognition of the personal merits and achievements of each employee, their career advancement in accordance with their abilities and professional training;

2) responsibility – The Company assumes responsibility for the obligations assumed, each employee of the Company bears high responsibility for the decisions he makes. In turn, the Society expects the same responsible approach from its partners. The society is aware of its social responsibility towards the state and society;

3) professionalism and development – deep knowledge of one's specialty, timely and high-quality fulfillment of tasks, continuous improvement of professional knowledge and skills. The Company creates equal and optimal conditions for professional development of employees at all levels, development of their professional knowledge and skills, while encouraging self-learning of employees, their constant striving for self-improvement;

4) mutual respect and trust – trust, goodwill and cooperation in the process of solving tasks. Trust in Society is based on business reputation, responsible business conduct, transparency, and principles of professional activity. Each employee creates and protects the reputation and authority of Society, and through his behavior forms an opinion about Society in society;

5) honesty and openness – all work in Society is based on the principles of honesty and openness. The Company strives for maximum openness and reliability of information about it, services and achievements, and performance results. The Company's employees are aimed at honestly, thoroughly and timely informing the Sole Shareholder and partners about the state of affairs, pursuing an active communication policy, increasing transparency and accessibility of information by improving the quality of reporting and accounting;

6) team spirit – cooperation among all employees of the Company to achieve high results from joint activities and common intentions. The Company's employees treat each other kindly and with respect, strive to create and maintain a positive atmosphere in the team, conducive to high-quality and fruitful work. Each of the employees shares their accumulated experience and condemns the creation of conflict situations.

7. Employees' commitment to the values and principles of Society lies in the fact that they fully share them and demonstrate them in their daily activities.

Commitment to the principles and values of the Company gives employees the opportunity to:

1) understand the strategic importance of your own work;

2) strengthen personal responsibility in their activities;

3) increase work motivation;

4) be proud of the results of your work and get moral satisfaction from it;

5) bring a positive emotional tone to the work;

6) improve the quality of work and learn new things every day;

7) understand that each of the employees performs important, complex and responsible work and makes a significant contribution to the work of the Company.

Chapter 4. Standards of business conduct

§4.1. Officials and employees of the Company

8. Relations between all employees of the Company are based on equality. Team relationships influence the mood of employees and their desire to work, and largely determine the outcome of the Company's work. By creating and maintaining a comfortable working environment, employees follow the following rules and regulations of business etiquette:

1) contribute to the creation of a stable and positive environment in the team by their attitude to work and behavior;

2) to make every effort for highly professional work, to take care of the Company's property, to use it rationally and effectively;

3) strive to show commitment to the provisions of the Code by personal example, devote time to consultations and mentoring, and unite the team into a team united by a common mission, values, and principles;

4) observe generally accepted moral and ethical standards, respect the state language and other languages, traditions and customs of peoples;

5) to ensure the unity of word and deed, to fulfill promises;

6) provide each other with reliable information in a timely manner, without violating confidentiality standards;

7) be polite and correct, attentive to other people's opinions;

8) be intolerant of indifference and rudeness;

9) provide support and assistance to colleagues, share knowledge and experience;

10) don't hide/admit your mistakes;

11) not to engage in matters unrelated to the performance of official duties during working hours.

9. The Company's officials are responsible for creating a system to prevent, identify and resolve situations involving violations of business conduct and rules of conduct. In order to ensure the sustainable implementation of the values and principles established by the Code, the Company's officials must:

1) make managerial decisions that comply with the requirements of the Code, based on the principles of transparency and impartiality;

2) to demonstrate by personal example their commitment to the requirements of the Code, including through the formation of a culture of behavior in which the Company's employees freely express concern about non-compliance with the requirements of business conduct and rules of conduct;

3) devote time to creating a team spirit among subordinates, consolidating the team into a team united by a common mission, values and principles of Society;

4) to advise and mentor subordinates;

5) create and maintain a high level of safe working conditions;

6) be able to admit your mistakes to your subordinates and not harass them for constructive criticism;

7) provide, including in cases stipulated by the legislation of the Republic of Kazakhstan, reliable information in a timely manner, without violating confidentiality standards and taking into account decisions of the Sole Shareholder and internal documents of the Company.

10. The Company's officials and employees assume the following obligations in relation to the Code:

Subparagraph 1) of paragraph 10 is set out in accordance with the decision of the Board of Directors of the Company dated February 28, 2025 (Minutes No. 03)

1) carefully study, understand and faithfully follow the requirements of business conduct and rules of conduct established by this Code, as well as be guided by the memo (Appendix 2);

2) to perform their official functions and duties in good faith, professionally, effectively and impartially;

- 3) be responsible for the obligations assumed, regardless of status and position;
- 4) provide assistance in conducting investigations on violations of the principles of business conduct and rules of conduct;
- 5) comply with information security requirements and procedures.

Chapter 4 was supplemented with paragraphs 10-1, 10-2 and 10-3 in accordance with the decision of the Board of Directors of the Company dated February 28, 2025 (Minutes No. 03)

10-1. The Company's officials and Employees are responsible for maintaining and promoting an environment free from discrimination and harassment, and for promptly reporting any incidents that they consider to be acts of discrimination and harassment. The Company recognizes its responsibility for prompt, fair and prompt consideration of such complaints.

10-2. The Company prohibits any form of harassment and/or discrimination in the field of work and adheres to a zero tolerance policy for such violations. This includes insults, threats, intimidation, neglect, indecent behavior, any form of harassment or other actions that discredit the honor and dignity of a person and create an unfavorable atmosphere in the working environment.

10-3. Officials and Employees of the Company are obliged to contribute to the creation and maintenance of a safe and inclusive working environment. Every member of Society should be responsible for their behavior, as well as counteract any manifestations of harassment and/or discrimination if they witness such behavior.

§4.2. The sole shareholder of the Company, the Board of Directors of the Company and subsidiaries of the Holding

11. Relations with the Sole Shareholder, the Board of Directors of the Company and the subsidiaries of the Holding are based on the principles of transparency, protection and respect for the rights and legitimate interests of all participants, accountability and responsibility in accordance with the requirements of the laws of the Republic of Kazakhstan "On Joint Stock Companies" and "On State Property", the Articles of Association of the Company and other internal regulatory documents of the Company.

12. The procedure for information exchange between the Management Board of the Company, the Board of Directors of the Company and the Sole Shareholder is regulated by the legislation of the Republic of Kazakhstan, the Charter and internal regulatory documents of the Company.

§4.3. Government agencies

13. The Company's interaction with government agencies is carried out in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and internal documents of the Company, based on the independence of the parties, in compliance with the principle of preventing corruption and other illegal actions, both on the part of government agencies and officials and employees of the Company.

§4.4. Partners

14. The Company is focused on providing services and support to exporters. The Company's strategy is aimed at continuously expanding partnerships and improving the quality of services provided. Paying attention to the individual needs of each partner is the basis of our policy. The Company aims at stable, long-term and mutually beneficial cooperation.

The Company provides partners with reliable information about services through the Company's corporate website, regularly published financial statements prepared by independent auditors, and other communication options.

15. The Company also guarantees timely and complete consideration of all requests, requests and claims from partners. In case of disagreements and disputes, the Society prefers negotiations and the search for a compromise.

16. The Company does not allow in its activities the provision of unreasonable benefits, privileges and advantages to partners that are not provided for by the legislation of the Republic of Kazakhstan, the use of which may negatively affect the Company's reputation.

17. The selection of partners and suppliers of goods, works, and services is carried out by the

Company on an open competitive basis in accordance with the requirements of the legislation of the Republic of Kazakhstan and is based on preference for the best price, quality, and conditions, as well as the business reputation of the counterparty.

18. The Company adheres to fair and free competition and condemns all manifestations of unfair competition, which can not only negatively affect the reputation of the Company, but also undermine the trust of partners in the Company. In this regard, the Company expects the same fair competition from its partners.

Chapter 5. Conduct standards

§5.1. Appearance and communications

19. During the performance of their official duties, officials and employees are advised to adhere to the norms of business style in choosing clothes, shoes and hairstyles that support a respectable and professional image of Society. Employees who work directly with clients should dress strictly in traditional business clothes.

20. Officials and employees should adhere to the rules of the culture of negotiation, including telephone. Business negotiations should be conducted in a calm, polite tone, without allowing negative emotions or raising your voice.

21. The ability of employees to talk on the phone with colleagues and business partners helps to create a favorable impression of Society as a whole. Also, when talking on the phone, you need to remember that colleagues may be in the same room and you should take care of their work and not distract them with loud conversation. When participating in a meeting, you need to turn off your cell phones or set them to silent mode.

22. There should be no situations when unauthorized visitors are alone in the office. If the employee to whom the visitor came is absent, it is necessary to politely redirect him, giving detailed explanations about who can solve the visitor's problem. Employees should be aware of the impact of their behavior on the reputation of the Company and avoid actions incompatible with the image of an employee of the Company.

§5.2. Public relations and mass media

23. The Company strives to raise the level of public awareness both inside and outside Kazakhstan about its activities. This can contribute to the formation of a positive public opinion about Society and strengthen the trust of investors and the public. The Company monitors compliance with high ethical standards in relations with the public and the media.

24. The Company does not allow the dissemination of false information, concealment and/or distortion of facts in public statements by officials and employees of the Company, its information and promotional materials or other public relations events.

25. Only authorized officials and employees of the Company have the right to speak publicly, comment on the events of the Company or make any statements on behalf of the Company in the mass media, including the Internet.

26. When speaking on behalf of the Company, authorized officials and employees are required to comply with generally accepted standards of professional conduct and business conduct, disseminate only reliable information, and prevent the disclosure of confidential information.

27. Officials and employees of the Company should not publicly express their opinions on matters of official activity and the Company's activities in general, if they:

- does not correspond to the main activities of the Company;
- discloses official information;
- contains unethical statements about officials or employees of the Company.

§5.3. Corporate resources

28. The Company provides employees with means of communication (landlines, personal computers, e-mail, fax, Internet access, etc.) exclusively for the performance of official duties in the

Company.

29. Electronic information resources, information stored in electronic form (information databases) contained in information systems, is the property of the Company, which fully implements the rights of ownership, use and disposal of them.

§5.4. Corporate social responsibility

30. The Company is aware of its social responsibility to the state and society and strives to meet the expectations of all stakeholders by building relationships with stakeholders based on the principles of partnership and respect, realizing that all initiatives should be aimed at developing the country's economy.

31. The Company's employees strive to faithfully fulfill the strategic goals and objectives set by the Sole Shareholder and regularly inform the Sole Shareholder about the results achieved. The Company implements and continuously improves international quality management standards to ensure high performance of its activities.

32. The Company provides favorable working conditions for its employees, providing decent wages, social support, motivation, and opportunities for professional growth, and supports programs aimed at improving the level of knowledge of employees. The remuneration policy in the Company is based on the recognition of the professional qualities and abilities of employees, the results of their work and the achievement of key performance indicators, and on the offer of a social package for motivation purposes in accordance with the Company's internal documents.

33. The Society strives to participate in social processes, in the promotion of cultural values and has a positive impact on solving socially significant issues through the implementation of socially oriented government programs, as well as its own sponsorship initiatives.

34. In accordance with international practice, the Company voluntarily publishes annual open reports on the economic and social performance of its activities, demonstrating its practical commitment to the principles of sustainable development.

§5.5. Confidentiality

35. Officials and employees of the Company exercise a special degree of responsibility when working with data constituting confidential information, including personal data in accordance with the legislation of the Republic of Kazakhstan, internal documents of the Company and take all necessary measures to protect such information.

36. Officials and employees of the Company must familiarize themselves with the internal documents of the Company regarding the confidentiality of information. When performing their duties, officials and employees must comply with these rules and procedures.

37. Officials and employees of the Company must take care to prevent unauthorized access and disclosure of confidential information to other employees who do not have access to confidential information, as well as to any third parties outside the Company, as well as to prevent the loss or destruction of data.

38. Officials and employees of the Company are obliged not to disclose confidential information for the duration of their employment, except in cases provided for by the legislation of the Republic of Kazakhstan, as well as after their termination of employment in the Company in accordance with their obligations.

39. Upon receiving information about a violation of the rules of confidentiality of information or a violation of the security of systems or devices, an employee must immediately report this fact in accordance with the procedure established by the Company's internal document.

§5.6. Conflict of interest

40. Avoiding conflicts of interest is an important condition for ensuring the protection of the interests of the Sole Shareholder, the Company, officials and employees.

The procedure for resolving conflicts of interest and/or corporate conflicts is regulated in separate internal regulatory documents of the Company.

41. All officials and employees of the Company are responsible for making transparent, timely and

adequate decisions, free from conflicts of interest. In order to avoid conflicts of interest, the Company's officials and employees must:

1) avoid any actions and relationships that could potentially cause a conflict of interest or the appearance of such a conflict;

2) refrain from providing benefits to legal entities that are managed or owned by close relatives;

3) immediately report any commercial or other interest (direct or indirect) in transactions, contracts, projects related to the Company, or in connection with other matters in accordance with the procedure provided for in the Company's internal documents;

4) notify in a timely manner about the performance of work and/or occupation of a position(s) in other organizations, about changes in the permanent (main) place of work (service, business, etc.);

5) before giving your consent to work or hold a position in a third-party organization that is not part of the Holding group, obtain the appropriate permission in accordance with the established procedure in accordance with the competence of the Board of Directors./Management Board of the Company /Chairman of the Management Board of the Company;

6) not to participate in the discussion and voting on issues in which there is an interest;

7) not to use the Company's resources, intellectual property, equipment and communications (including corporate mail and computer programs) for personal purposes;

8) in case of doubts about the legality of the assignment received for execution, the employee must immediately inform his immediate supervisor and the supervisor who gave the assignment in writing. If a higher-ranking supervisor confirms this order in writing, the employee is obliged to comply with it, if its fulfillment does not entail actions that are criminally punishable. Responsibility for the consequences of an employee's execution of an unlawful order is borne by the supervisor who confirmed this order.

42. In the event of a conflict of interest, the Company's officials and employees are obliged to notify their immediate supervisor, officials and other authorized persons of the Company in writing about the conflict of interest or the possibility of its occurrence as soon as they become aware of it.

43. In case of conflicts, the participants seek ways to resolve them through negotiations in order to ensure effective protection of both the rights of the Sole Shareholder and the business reputation of the Company.

44. The main task of the Company's officials and employees in the conflict of interest settlement process is to find a solution that, being legitimate and justified, would meet the interests of the Company.

At the same time, the immediate supervisor or the management of the Company, upon an employee's request or upon receiving information from other sources, must promptly take the following measures to prevent and resolve conflicts of interest:

1) to dismiss an employee from the performance of official duties and entrust another person with the performance of official duties on an issue in connection with which a conflict of interests has arisen or may arise;

2) change job responsibilities;

3) take other measures to eliminate the conflict of interests.

§5.7. Corruption and other illegal actions

45. The Company makes every effort to prevent corruption and other illegal actions in order to obtain or maintain unjustified benefits and advantages, both from interested parties and from officials and employees of the Company.

46. The Company's officials performing managerial functions are equated to persons authorized to perform government functions and are responsible for corruption offenses in accordance with the legislative acts of the Republic of Kazakhstan.

47. Officials, employees of the Company or their close relatives are prohibited from accepting:

1) remuneration in the form of money, services and other forms for the performance by an official or employee of the Company of their professional duties from individuals and organizations in which they do not perform the relevant duties;

2) gifts or services in connection with the performance of their professional duties or from persons dependent on them for work, with the exception of symbolic tokens of attention and symbolic souvenirs in accordance with generally accepted norms of courtesy and hospitality or during protocol and other official events;

3) other benefits and advantages, the adoption of which is prohibited by the legislation of the Republic of Kazakhstan in the field of anti-corruption.

48. The Company's employees are obliged to inform the Company's officials and/or authorized employees and the Ombudsman about cases of corruption offenses that have become known to them.

The issues of anti-corruption organization and prevention of corruption offenses are regulated by the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company.

§5.8. Control measures

49. The Company's officials and employees are required to strictly adhere to the requirements of the Code and report any violations of the requirements of the Code. In order to achieve the Company's strategic goals, the Company's officials make business decisions based on the fundamental values and principles of business conduct, and bear full responsibility for the implementation of the tasks assigned to them.

Officials and employees of the Company, according to their competence, are required to respond to problems related to violations of business conduct requirements by:

- 1) taking timely measures to rectify the situation and eliminate deficiencies;
- 2) adoption/proposal of effective disciplinary measures in accordance with the procedure established by law;
- 3) conducting consultations with the relevant structural divisions/ employees of the Company and providing them with the necessary information.

50. The Company encourages employees who are ready for an open discussion of the Code and welcomes any constructive suggestions for its improvement.

Paragraph 51 is set out in accordance with the decision of the Company's Board of Directors dated February 28, 2025 (Minutes No. 3)

51. Officials and employees of the Company, as well as partners and interested persons, have the right to apply:

to the Ombudsman regarding the requirements of the Code and violations of the requirements of the Code and/or ethical issues that have arisen in the course of work, as well as labor conflicts (violations of the principles of business conduct and rules of conduct by officials are reviewed by the Company's Board of Directors);

to the Compliance Service for facts, corruption and other illegal actions.

52. If circumstances of violation by the Company's employees of the approved requirements of business conduct are revealed, the materials for decision-making are sent for consideration to the Disciplinary Commission of the Company, the working procedure of which is determined by the relevant internal regulatory document of the Company.

Chapter 6. Institute of the Ombudsman

§6.1. The status of the Ombudsman

53. The appointment and early termination of the Ombudsman's powers is carried out by the Board of Directors of the Company. The presence of the candidate(s) for the appointment of the Ombudsman at the specified meeting is mandatory.

54. The Ombudsman carries out his activities in accordance with the legislation of the Republic of Kazakhstan, the Charter, this Code and other internal regulatory documents of the Company.

Paragraph 55 is set out in accordance with the decision of the Company's Board of Directors dated February 28, 2025 (Minutes No. 3)

55. The Ombudsman is subject to re-election every two (2) years. The decision of the Board

of Directors on the appointment of an Ombudsman indicates the term of office. The Board of Directors of the Company evaluates the results of the Ombudsman's activities and decides on the extension or termination of the powers of the person holding the position of Ombudsman.

56. Proposals on a candidate for appointment as an Ombudsman may be submitted by the Company's Board of Directors, the Company's Management Board, and the Sole Shareholder.

A candidate for the position of Ombudsman should have an impeccable reputation, high authority, and the ability to make impartial decisions.

57. The main functions of the Ombudsman are:

1) reviewing appeals from employees and officials of the Company and making recommendations for their resolution, including through interaction with government agencies and management bodies of the Company;

2) collecting information on violations and non-compliance with the provisions of this Code with the formation of an annual Report on the state of the moral and ethical climate in Society;

3) consultation of employees and officials on the provisions of the Code;

4) initiating the consideration of disputes on violations of the provisions of the Code and participating in their settlement through out-of-court and judicial procedures. Regarding corporate conflicts and conflicts of interest, the Ombudsman coordinates his actions with those responsible for resolving corporate conflicts and conflicts of interest, in accordance with the Policy on Resolving Corporate Conflicts and Conflicts of Interest of the Company.

58. In cases of violations of the provisions of the Code, the Company's employees have the right to apply to the Ombudsman, both orally and in writing, as specified in Appendix 3 to this Code.

Paragraph 59 is set out in accordance with the decision of the Company's Board of Directors dated February 28, 2025 (Minutes No. 03)

59. Anonymous appeals are not subject to consideration, except in cases where such an appeal contains information about corruption and criminal offenses being prepared, committed or committed, or about a threat to state or public security, and which is subject to immediate referral to authorized state bodies, provided that the information received is sufficient to verify the facts/circumstances set out in the appeal.

§6.2. Rights and duties of the Ombudsman

60. The Ombudsman has the right:

1) initiate procedures to identify violations of the provisions of the Code, both on the basis of received requests from partners, employees and officials, and on their own initiative;

2) to request and receive from the Company's officials and employees the information necessary for the consideration of appeals and on issues of non-compliance with this Code;

3) provide explanations of the provisions of this Code to the Company's officials and employees;

4) for immediate reception by the Company's managers and other officials;

5) other rights necessary for the exercise of the functions assigned to the Ombudsman.

61. In carrying out his/her activities, the Ombudsman is obliged to:

1) to ensure the protection (within the framework of the procedures established by labor legislation) of employees, for the period of dispute resolution procedures on violations of the Code, in case of situations of their forced dismissal due to the initiation of consideration of such cases;

2) participate in the review of issues regarding non-compliance with the Code;

3) keep records of complaints from employees, officials, as well as business partners and interested parties regarding non-compliance with the provisions of the Code;

4) provide explanations of the provisions of the Code to the Company's employees within 5 (five) business days if they apply;

5) to observe independence and impartiality when considering disputes on issues of non-compliance with the Code;

6) ensure the anonymity of an employee or official who has applied for a violation of the provisions of the Code (if they wish to remain anonymous);

7) to submit for consideration by the relevant bodies and officials of the Company the

received appeals or problematic issues identified by them, which are systemic in nature and require appropriate decisions (comprehensive measures);

8) submit a Report to the Board of Directors at least once a year on the results of the work carried out, including on the state of the moral and ethical climate in the Company, with the development and introduction of specific recommendations for its improvement.

Chapter 7. Practical application of the Code

Paragraph 62 is set out in accordance with the decision of the Company's Board of Directors dated February 28, 2025 (Minutes No. 3)

62. The structural unit of the Company responsible for human resource management ensures:

1) in respect of officials and employees of the Company, familiarization with the Code within 10 (ten) business days from the date of its entry into force;

2) in respect of newly hired employees, familiarization with the Code no later than one month after the conclusion of the employment contract;

3) in case of amendments and additions to the Code, familiarization of the Company's officials and employees no later than 10 (ten) business days after the introduction of the amendments and additions into force;

4) in respect of all employees of the Company, an annual knowledge test of this Code is carried out.

Chapter 8. Final provisions.

63. This Code comes into force from the moment of its approval. The Company will improve this Code taking into account amendments and additions to the legislation of the Republic of Kazakhstan and the emergence of new standards of business conduct in international and national practice.

64. Issues not regulated in this Code are regulated by the legislation of the Republic of Kazakhstan, the Charter and internal regulatory documents of the Company.

Appendix 1 was deleted in accordance with the decision of the Company's Board of Directors dated February 28, 2025 (Minutes No. 03)

HANDOUT

How to act when in doubt on business conduct issues?

1. Officials and employees of the Company must understand the provisions of the Code, as well as other internal documents of the Company, and always follow them. Those who do not comply with the Code put themselves, their colleagues, and Society at risk. It is necessary to always keep in mind the ethical side of the actions performed.

2. In case of uncertainty about the correctness of their actions, everyone can ask for advice/ advice / recommendation, and first ask themselves a few simple questions.:

- Is the action that is causing concern legitimate?
- does it comply with the Code? Does it correspond to the values of Society?
- Does it expose Society to any unacceptable risks?
- Does it meet our obligations?

Is there any other way of behaving that would not lead to an ethical conflict?

- will there be a feeling of awkwardness if others find out about these actions?
- does it seem right?

3. To determine whether or not a gift or event is acceptable, everyone should first ask themselves the following questions:

- the intention of the giver: "what is the purpose of the gift or event: is it just to show the usual signs of attention, or to influence the objectivity of a business decision?";
- cost and frequency: "Is this gift or event modest and infrequent, or may they impose some kind of counter obligations?";
- legality: "are you sure that the gift or event does not contradict the legislation of the Republic of Kazakhstan and the Code?";
- transparency: "wouldn't it be a shame if the management or others outside the Society became aware of this?".

At the same time, everyone should understand that for offenses that create conditions for corruption, as well as corruption offenses related to the illegal receipt of benefits and advantages, he is responsible in accordance with the legislation of the Republic of Kazakhstan.

4. When making a decision that may affect the ethical behavior of a particular person or Society as a whole, the following actions are recommended:

- before you act, you need to think and ask yourself the above questions;
- to study the relevant norms of publicly available documents of the Company and the legislation of the Republic of Kazakhstan;
- consider options for resolving the issue and their consequences;
- think about who it might affect;
- determine your level of responsibility;
- get acquainted with all relevant facts, documents and information;
- assess the risks and ways to reduce them;
- consider the best course of action, consult with others;
- make sure that all the provisions contained in the Code and other internal documents of the Company are taken into account;
- to bring the decision to the attention of interested parties;
- analyze the acquired experience and share it with others.

APPLICATION FORM

**To the Chairman of the Management Board
of the Export Credit Agency of Kazakhstan JSC**

**To the Ombudsman
of the Export Credit Agency of Kazakhstan JSC**

(the applicant chooses to whom to address his appeal)

From _____
(specify full name, and for legal entities – name)

Address: _____ *(specify postal code, name of locality, street, house/apartment/office number)*

Contact phone numbers _____

E-mail (if available) _____

I am contacting you in connection with the following *(it is necessary to state in detail the essence of the issue of the application of the provisions of the Code of Business Conduct or its violation)*.

In this regard, I ask *(it is necessary to describe the essence of the request addressed to the Ombudsman)*.

Please provide the answer:

- in writing to the address indicated in this request;
- by sending a message to my e-mail address specified in this request
(choose a way to receive a response to the sent request).

Date and signature of the applicant *(if the request comes from a legal entity, specify the full name and position of the person sending the request or the representative of the legal entity. In this case, a copy of the power of attorney for the right to represent the interests of this legal entity should be attached to the request)*.