# **KAZAKHSTAN STOCK EXCHANGE JSC**

## Approved

by a decision of the Board of Directors of Kazakhstan Stock Exchange JSC (minutes No. 15 of the meeting dated May 28, 2024)

#### **Effective**

as of May 29, 2024

# **ANTI-CORRUPTION POLICY**

This Policy has been developed in accordance with the law of the Republic of Kazakhstan "On Anti-Corruption" (hereinafter referred to as the Law), other legislative acts of the Republic of Kazakhstan and international standards in the field of anti-corruption, the Compliance risk management policy Kazakhstan Stock Exchange JSC, as well as internal documents of Kazakhstan Stock Exchange JSC (hereinafter referred to as the Exchange).

### Article 1. General provisions

- This Policy is an internal document of the Exchange that establishes goals, tasks and main principles in the field of combating corruption on the Exchange, aimed at preventing, identifying, suppressing and minimizing the consequences of corruption on the Exchange.
- 2. The anti-corruption system is an integral part of the Exchange's compliance risk management system.
- The concepts and symbols used in this Policy are used in the meanings in which
  they are used in the legislation of the Republic of Kazakhstan and internal
  documents of the Exchange.
- 4. The following terms and definitions are used in this Policy:
  - anti-corruption policy legal, administrative and organizational measures aimed at reducing corruption risks, increasing public confidence in activities of government bodies, and other measures in accordance with the Law;
  - 2) **anti-corruption restrictions** restrictions established by the Law and aimed at preventing corruption offences;
  - 3) corruption illegal use by an employee of the Exchange of his work-related (official) powers and related opportunities in order to obtain or extract personally or through intermediaries material (non-material) benefits and advantages for himself or third parties, as well as bribery of these persons by providing benefits and benefits;
  - 4) **corruption offense** an unlawful guilty act (action or inaction) that has signs of corruption, for which administrative or criminal liability is established by the legislation of the Republic of Kazakhstan;
  - 5) **corruption risk** the likelihood of the occurrence of causes and conditions conducive to the commission of corruption offenses;
  - 6) conflict of interest a contradiction between the personal interests of the Exchange's employees and their official powers, in which the personal interests of these persons may lead to their failure to perform and/or improper performance of their official duties;
  - 7) anti-corruption activities of the Exchange's employees within their powers to prevent corruption, including the formation of an anti-corruption culture, identifying and eliminating the causes and conditions facilitating the committing of corruption offenses, as well as identifying, suppressing, disclosing and investigating corruption offenses and eliminating their consequences:
  - 8) **prevention of corruption** activities of the Exchange's employees to study, identify, limit and eliminate the causes and conditions facilitating the committing of corruption offenses through the development and implementation of a system of preventive measures;
  - gift goods, jobs, services, money or any other material benefits provided (transferred) free of charge to an employee/executive of the Exchange and/or his spouse/close relative (including transfer of property rights, release from duties, refusal of any – rights in favor of an employee/executive of the Exchange or his affiliates, provision of discounts, loans, payment for entertainment, recreation, travel expenses, etc.) for actions (inaction) in favor

- of the client/counterparty or other person who provided them, if such actions are within the official (functional) powers of the employee/official or he, by virtue of his official position, can contribute to such actions (inaction);
- 10) **authorized anti-corruption body** a state body that carries out the formation and implementation of the anti-corruption policy of the Republic of Kazakhstan and coordination in the field of anti-corruption, as well as the prevention, detection, suppression, disclosure and investigation of corruption offenses, and its territorial divisions;
- 11) **economic entity** a legal or natural person carrying out economic activities on its own behalf;
- 12) register of unconscientious participants in public procurement a list of potential suppliers, formed in accordance with the law of the Republic of Kazakhstan "On public procurement";
- 13) **register of unconscientious procurement participants** a list of potential suppliers formed in accordance with the law of the Republic of Kazakhstan "On procurement of individual entities of the quasi-public sector":
- official an employee of the Exchange, permanently, temporarily or by special authority performing organizational, administrative or administrative functions at the Exchange, as well as a person authorized to make decisions on organizing and conducting procurement, holding a position not lower than the head of an independent structural unit: Chairman and members of the Management Board, financial director, managing director, chief accountant, head of the procurement unit, which are determined for the purposes of this Policy;
- 15) **subsidiaries** legal entities, the decision of which may be determined by the Exchange on the basis of the presence of a predominant stake in the authorized capital / a predominant holding of shares or concluded agreement(s) with the Exchange;
- 16) **counterparties** mean all individuals and legal entities who have entered into civil contracts with the Exchange.
- 5. This Policy is subject to mandatory application and compliance by all officials and other employees of the Exchange.
- 6. The provisions of this Policy are applied by subsidiaries taking into account the specifics and features of the activities they carry out.
- 7. The provisions of this Policy may apply to other legal entities and individuals, with the exception of subsidiaries with which the Exchange enters into contractual relations, and such conditions must be recorded in agreements concluded by the Exchange with them.

# Article 2. Goals, tasks and main principles of anti-corruption

- 1. The main goals of anti-corruption are precaution, detection, prevention and minimization of cases of corruption on the Exchange.
- 2. Achieving anti-corruption goals is achieved by solving the following tasks:
  - 1) creation and implementation of mechanisms for implementing the main principles of anti-corruption;
  - developing intolerance towards corruption among employees of the Exchange;
  - 3) minimizing the risks of involvement of the Exchange and its employees in corruption activities;
  - 4) ensuring effective monitoring of the implementation of anti-corruption measures:
  - 5) ensuring compliance by employees of the Exchange with the requirements of the anti-corruption legislation of the Republic of Kazakhstan and this Policy.
- 3. Anti-corruption efforts at the Exchange are carried out on the basis of the following principles:
  - legality anti-corruption measures on the Exchange are implemented in strict accordance with the anti-corruption legislation of the Republic of Kazakhstan using the best international practices in this area;
  - non-acceptance of corruption in any forms and manifestations officials and other employees of the Exchange are prohibited from directly or indirectly, personally or through any intermediary, participating in any corrupt practices;
  - 3) employee involvement the Exchange encourages all its employees and other interested parties to report their suspicions about possible violations and cases of non-compliance with the requirements of this Policy, as well as propose measures to improve the system for preventing and combating corruption;
  - 4) **preventing conflicts of interest** each employee of the Exchange, when performing his official duties, must put the interests of the Exchange above his personal interests and prevent the occurrence of situations that are or may be regarded as a conflict of interest:
  - 5) **the inevitability of punishment** the Exchange declares the inevitability of punishment for committing corruption offenses in the performance of their official duties, regardless of the position held, length of service and other conditions:
  - 6) due diligence the Exchange observes due diligence in relation to its clients/counterparties and candidates for a vacant position before making a decision to begin or continue business/employment relations to ensure their reliability and the absence of a conflict of interest.

# Article 3. Types of corruption offenses, factors of their occurrence and measures to combat corruption

- 1. Types of corruption offenses for which liability is provided in accordance with the legislation of the Republic of Kazakhstan are:
  - receiving and giving bribes and/or illegal material reward, mediation in bribery;
  - 2) abuse and excess of official powers;

- 3) inaction on duty and negligence;
- 4) illegal participation in business activities;
- 5) official forgery;
- commercial bribery for the purpose of obtaining benefits and advantages for oneself or other individuals and legal entities or causing harm to other individuals and legal entities;
- 7) receipt of other material (non-material) benefits and advantages in accordance with anti-corruption legislation.
- 2. The main factors influencing the occurrence of corruption on the Exchange are:
  - 1) ineffective organizational structure and personnel policies;
  - 2) poor corporate culture among employees;
  - 3) low-quality internal documents and their inconsistency with the legislation of the Republic of Kazakhstan on combating corruption;
  - non-transparency of the services provided, procurement processes and sale of the Exchange's property;
  - 5) ineffectiveness of the internal control system;
  - 6) low level of communication with/between employees.
- 3. The following anti-corruption measures are applied at the Exchange:
  - 1) anti-corruption monitoring;
  - 2) internal analysis of corruption risks;
  - 3) formation of an anti-corruption culture;
  - 4) identification of corruption-related norms in internal documents of the Exchange;
  - 5) establishing anti-corruption restrictions for officials;
  - 6) prevention and resolution of conflicts of interest;
  - measures to suppress, disclose corruption offenses and eliminate their consequences;
  - 8) submitting regular reports to the Board of Directors and the authorized body on anti-corruption issues;
  - carrying out comprehensive verification and assessment of the reliability of counterparties;
  - 10) inclusion of anti-corruption clauses in standard contracts of the Exchange in order to prevent the commission of corrupt acts during their execution;
  - 11) other measures not prohibited by the legislation of the Republic of Kazakhstan.

# Article 4. Anti-corruption standards

- 1. Anti-corruption standards a system of recommendations established for the activities of the Exchange, aimed at preventing corruption.
- 2. Anti-corruption standards determine the actions and decisions of the Exchange's employees aimed at strict compliance with established rules and prevention of corruption, in accordance with Appendix 1 to this Policy.

## Article 5. Anti-corruption restrictions

- 1. In order to prevent the commission of actions that may lead to the use of their powers in personal, group and other non-official interests, officials undertake anti-corruption restrictions on:
  - 1) carrying out activities incompatible with the performance of official powers;
  - the inadmissibility of joint service (work) of close relatives, spouses and inlaws;
  - use of confidential and other information not subject to official dissemination in order to obtain or extract material and non-material benefits and advantages;
  - 4) accepting material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions are within the official powers of the persons, or these persons, by virtue of their official position, can facilitate such actions (inaction);
  - opening and owning accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, storing cash and valuables in foreign banks located outside the Republic of Kazakhstan.

#### 2. Officials are prohibited from:

- independently participate in the management of an economic entity, if management or participation in the management of an economic entity is not included in their official responsibilities in accordance with the laws of the Republic of Kazakhstan, contribute to the satisfaction of the material interests of organizations or individuals through the unlawful use of their official powers in order to obtain property or other good;
- 2) engage in entrepreneurial activity, with the exception of:
  - acquisition and/or sale of shares of open-ended and interval mutual investment funds, bonds on the organized securities market, shares of commercial organizations (common shares in an amount not exceeding five percent of the total number of voting shares of organizations) on the organized securities market;
  - renting out a dwelling owned by them by right of ownership, and receiving income from such letting;
- engage in other paid activities, except for teaching, scientific and other creative activities;
- hold positions directly subordinate to positions occupied by their close relatives, spouse and/or relatives, and also have close relatives, spouse and/or relatives directly subordinate to them;
- 5) hold positions with their close relatives, spouse and/or relatives in the same management body (supervisory board, executive body) of the Exchange or other entity of the quasi-public sector:
- 6) carry out official duties if there is a conflict of interest.
- 3. Officials, within 30 calendar days from the date of taking office, are obliged to transfer into trust management for the duration of the performance of these functions in the manner established by the laws of the Republic of Kazakhstan, property belonging to them, the use of which entails the receipt of income, with the exception of money, bonds, public shares and interval mutual investment funds legally owned by them, as well as property transferred for property lease.
- 4. Officials have the right to hold paid positions in the management bodies, supervisory boards, executive bodies of subsidiaries, dependent and affiliated legal entities of the Exchange.

- 5. Failure to fulfill obligations by officials is grounds for their termination of their powers.
- 6. The consent of officials to adopt anti-corruption restrictions is formalized by the HR department upon hiring and/or appointment to an executive position by signing statements in accordance with Appendix 2 to this Policy, which are stored in the personal files of officials.
- 7. Officials and other employees of the Exchange in the event of a conflict of interest or the possibility of its occurrence, we are obliged to notify the superior and the compliance department in the manner prescribed by the Exchange's internal document regulating issues of conflict of interest management.

## Article 6. Receiving and giving gifts

- 1. Under no circumstances should the receipt/giving of a gift by an official or other employee of the Exchange constitute a hidden reward that could have a negative impact on the reputation of officials and other employees of the Exchange.
- 2. Officials and other employees of the Exchange are prohibited from:
  - accepting gifts for themselves, their spouse, a close relative, transferred by the Exchange's counterparty, other third parties in connection with such employee's performance of any actions (inaction) related to his official and functional responsibilities at the Exchange;
  - accepting/giving gifts on behalf of the Exchange and its employees to third parties in the form of money, regardless of the form (cash/non-cash) and type of currency;
  - 3) ask or enforce to the giving of gifts.
- 3. Officials and other employees of the Exchange have the right, subject to the restrictions provided for in this article, to accept/give business gifts (of an advertising, image nature):
  - related to conducting seminars, presentations and other business/corporate events;
  - 2) intended for presentation, such as greeting cards, honorary badges, certificates from the Exchange or other legal entity;
  - 3) awards, prizes received for participation in events held by the Exchange, as well as for achievements in the exchange market.
- 4. Any gifts must be rejected/returned to the donor in an ethical manner if they do not meet the criteria specified in paragraph 3 of this article.
- 5. Gifts received without the knowledge of officials and/or members of their families, as well as received by them in violation of the requirements of this article, are subject to gratuitous transfer to the authorized body for the management of state property within seven calendar days from the date of receipt of the gift or from the day when the official the person became aware of the receipt of the gift, and services provided to these persons under the same circumstances must be paid for by transferring money to the republican budget within seven calendar days from the date of provision of the service or from the day when the official became aware of the provision of the service.
- 6. Employees of the Exchange are required to inform the compliance department about the facts of receiving gifts within two business days from the date of their receipt.
- 7. The Exchange prohibits the payment or acceptance of facilitation payments made to officials and employees to perform or expedite routine procedures, the amounts of which differ from official fees for services.

8. The Exchange does not finance political parties, public associations, and also does not participate in charity and sponsorship projects in order to obtain or maintain an advantage for the implementation of its activities.

## Article 7. Procurement of goods, jobs and services

When purchasing goods, jobs and services, you must:

- 1) optimally and efficiently spend the money used for procurement;
- 2) provide potential counterparties with equal opportunities to participate in the procurement procedure;
- 3) maintain fair competition among potential counterparties;
- 4) promote openness and transparency of the procurement process;
- 5) prevent corruption;
- 6) not to allow close relatives, spouses or relatives (relatives of spouses) of employees of the Exchange who have the right to make decisions on choosing a counterparty or who are initiators or organizers of ongoing procurements to participate in ongoing procurements as potential counterparties;
- 7) not to allow the participation of a potential counterparty and/or a subcontractor (co-contractor) attracted by it, who have unfulfilled obligations under executive documents and are included in the Register of Unscrupulous Participants in Public Procurement and/or the Register of Unscrupulous Participants in Procurements, formed on the basis of court decisions that have entered into legal force, and based on the decision of the authorized body to recognize potential suppliers as unscrupulous participants in public procurement / procurement and posted on the Internet resources https://goszakup.gov.kz / https://eep.mitwork.kz/ru.

#### Article 8. Selection, placement and personnel management

When selecting, placing personnel and managing personnel, heads of structural divisions should:

- prevent cases of selection and placement of personnel on the basis of kinship, community and personal loyalty, ensure compliance with the principles of meritocracy;
- 2) comply with the requirements of the labor legislation of the Republic of Kazakhstan;
- 3) when applying for a job at the Exchange, explain the main responsibilities, prohibitions and restrictions imposed on the employee;
- prevent the unreasonable transfer of information about personal data of employees;
- 5) not to demand or contact officials appointed to positions with a request to provide any services of a personal nature;
- 6) specifically and clearly define the tasks and scope of official powers of employees;
- 7) prevent uneven distribution of workload between employees;
- 8) not give clearly impossible orders or those that go beyond the scope of their official duties, as well as those that contradict the legislation of the Republic of Kazakhstan;
- 9) not to use your official position to influence the activities of subordinates when resolving issues of an extra-official nature;
- 10) not to force subordinates to commit corruption offenses;

- 11) prevent and suppress violations of the anti-corruption legislation of the Republic of Kazakhstan by subordinates and other persons;
- 12) timely take comprehensive measures to resolve conflicts of interest that arise among employees of one division in the course of performing their official duties;
- 13) take comprehensive measures to prevent corruption;
- 14) eliminate the causes and conditions conducive to the commission of corruption offenses, including with subordinates;
- 15) not to participate in gambling of a monetary or other material nature with a superior or inferior person, or a person who is otherwise dependent on him for work;
- 16) not to allow subordinates to be recruited to carry out non-official or personal assignments.

## Article 9. Application of anti-corruption measures

- 1. The Exchange takes measures to prevent and combat corruption in accordance with the norms of the anti-corruption legislation of the Republic of Kazakhstan using international standards.
- Anti-corruption monitoring carried out at the Exchange is thematic and is carried
  out for the purpose of assessing law enforcement practice in the field of anticorruption by collecting, processing, summarizing, analyzing and evaluating
  information regarding anti-corruption policy, the status and analysis of information
  regarding the effectiveness of measures taken by the Exchange on anticorruption.
- 3. Anti-corruption monitoring is carried out by the compliance department on a quarterly basis by studying publications in the media, reports of the Internal Audit Service, complaints (appeals) of individuals and legal entities, and the presence/absence of potential conflicts of interest among employees of the Exchange. Results of anti-corruption monitoring are included by the compliance department in the compliance risk management report on a quarterly basis and may form the basis for conducting an internal analysis of corruption risks.
- 4. Internal analysis of corruption risks (hereinafter referred to as the Analysis) is carried out based on the results of anti-corruption monitoring in order to identify and study the reasons contributing to the commission of corruption offenses. The analysis is carried out by the compliance department at least once a year in the manner prescribed by the Exchange's internal document, which determines the procedure for implementing measures aimed at combating corruption.
- 5. For the purpose of precaution, prevention or detection of corruption offenses, employees and counterparties of the Exchange, as well as other third parties may inform the Exchange through any of the following communication channels that ensure confidentiality:
  - 1) e-mail address: anticorruption@kase.kz;
  - 2) helpline: +7 (727) 237 6020;
  - 3) postal address: 280 Baizakov St., North Tower of the multifunctional complex "Almaty Towers", 8th floor, city of Almaty A15G7M6, Republic of Kazakhstan.
- In order to develop an anti-corruption culture among employees, the compliance department implements a training and education program for employees on anticorruption issues in accordance with the Action Plan of the compliance department.

## Article 10. Activities to combat corruption and create an anti-corruption culture

1. The main areas of the Exchange's anti-corruption activities are:

- 1) implementing a unified policy of the Exchange in the field of anti-corruption and creating a negative attitude towards corrupt behavior at the Exchange;
- 2) appointing divisions or authorized persons of the Exchange responsible for the prevention of corruption and other offenses;
- regular assessment of corruption risks in order to identify areas of the Exchange's activities most exposed to such risks, development of appropriate anti-corruption measures;
- 4) identification and resolution of conflicts of interest on the Exchange;
- 5) training, informing and consulting employees of the Exchange on issues of preventing and combating corruption (familiarization with the legislation of the Republic of Kazakhstan and internal documents of the Exchange governing issues of preventing and combating corruption, conducting training events, organizing individual consulting for employees of the Exchange);
- 6) implementation of measures to prevent corruption when interacting with counterparties;
- 7) internal control and audit (ensuring compliance of the Exchange's internal control and audit system with the provisions of anti-corruption standards, regular monitoring of compliance with internal procedures and standards, accounting data, the availability and reliability of primary accounting documents, economic feasibility of expenses in areas with a high corruption risk, preventing the preparation of unofficial reporting and the use of forged documents, improving the procedure for using the property and resources of the Exchange);
- 8) unification of rights and restrictions, prohibitions and obligations established for employees of the Exchange;
- 9) interaction of the Exchange on anti-corruption issues with government bodies, organizations and citizens.
- 2. Creating an atmosphere of intolerance towards corruption activities to strengthen the Exchange's employees' belief in the need to combat corruption through the prism of a system of values generally recognized in society.
- 3. The Exchange's anti-corruption culture is formed through a set of general educational, informational and organizational measures, including:
  - 1) training on anti-corruption issues;
  - 2) viewing and discussion of thematic video materials;
  - organizing meetings with representatives of government bodies and public associations with the subsequent development of measures to combat corruption;
  - 4) development and implementation of internal documents;
  - 5) carrying out explanatory and other events.

# Article 11. Responsibility of officials for organizing work aimed at combating and preventing corruption

- 1. The Exchange and its officials implement anti-corruption measures within their competence in accordance with the Law.
- 2. The effectiveness of measures aimed at combating and preventing corruption is supported by the principled position of the Exchange's management, which is characterized by consistency, systematicity and continuity of action.

## Article 12. Final provisions

- 1. Responsibility for fulfilling the requirements of this Policy rests with all employees.
- 2. The contents of this Policy must be brought to the attention of each employee of the Exchange by the HR department upon hiring, as well as in the event of changes and/or additions to this Policy to all employees of the Exchange.
- 3. Issues not regulated by this Policy are resolved in accordance with the legislation of the Republic of Kazakhstan, the charter of the Exchange, its internal documents, as well as decisions of bodies and officials adopted in the prescribed manner, within their competence.
- 4. This Policy is subject to publication on the Exchange's Internet resource.
- 5. This Policy is subject to review for the need for updating at least once every three years, calculated from the date of entry into force of this Policy, and in the case of its updating from the date of entry into force of the latest changes and/or additions.

Chairman of the Management Board

A. Aldambergen

Annex 1

to the Anti-Corruption Policy

# ANTI-CORRUPTION STANDARDS

# of Kazakhstan Stock Exchange JSC

- 1. Anti-corruption standards for employees of Kazakhstan Stock Exchange JSC (hereinafter referred to as the Exchange) were developed in accordance with paragraph 2 of Article 10 of the Law of the Republic of Kazakhstan "On Combating Corruption" in order to establish a system of recommendations aimed at preventing corruption on the Exchange.
- 2. Anti-corruption standards are aimed at achieving an atmosphere of intolerance towards any manifestations of corruption at the Exchange by creating a system of value and moral anti-corruption behavior guidelines for employees of the Exchange when performing their official functions.
- 3. Name of the sphere of public relations: finance, including stock exchange and banking activities.
- 4. The principles of anti-corruption standards are:
  - 1) legality;
  - 2) transparency;
  - 3) ethics:
  - 4) respect for the rights and legitimate interests of individuals and legal entities and their protection from corruption;
  - 5) avoidance of conflicts of interest.
- 5. Anti-corruption standards define the following standards of behavior for employees of the Exchange:
  - be guided by the principle of legality, the requirements of the Constitution of the Republic of Kazakhstan, laws and other regulatory legal acts of the Republic of Kazakhstan, strictly comply with anti-corruption legislation;
  - 2) ensure compliance and protection of the rights, freedoms and legitimate interests of individuals and legal entities;
  - 3) not allow oneself to commit actions that could discredit the Exchange:
  - 4) report to the immediate or direct manager about the occurrence of a conflict of interest, personal interest in the performance of official duties, inclination to corrupt behavior and receiving gifts;
  - 5) not be guided by personal and/or selfish interests when performing their official duties;
  - 6) refrain from making unlawful requests to colleagues and managers that violate the established order of relationships, which may influence their adoption of an impartial official decision;
  - 7) not to induce other employees to commit corruption offenses and not to encourage such actions;
  - 8) not to accept gifts in connection with the performance of official duties;
  - 9) not to use confidential and other information that is not subject to dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
  - 10) refuse appointment to a position if it is associated with direct subordination or control to persons in close family and family relationships (parents, spouses, brothers, sisters, children, relatives (brothers, sisters, parents and children of the spouse));

- 11) be active in combating corruption and uncovering corruption offenses;
- 12) immediately inform the direct or immediate supervisor in writing about doubts about the legality of the order received for execution;
- 13) contact higher management if the immediate manager is himself involved in a conflict of interest:
- 14) support and demand from colleagues compliance with a high legal anti-corruption culture;
- 15) not use the means of material, technical, financial and information support, as well as other property of the Exchange for non-official purposes;
- 16) notify the division implementing the anti-corruption policy of the Exchange and the division implementing the personnel management policy of the Exchange of intention or actual participation in business activities.
- 6. Managers at all levels in relations with subordinates must:
  - 1) accurately determine the tasks and scope of official powers of subordinate employees;
  - 2) prevent uneven distribution of workload between subordinate employees;
  - 3) show fairness and objectivity when assessing the performance of subordinates, as well as applying incentives and penalties;
  - 4) not to give subordinates orders that are clearly impossible to implement or go beyond the scope of their official duties, as well as those that are contrary to law;
  - 5) not to use official position to influence the activities of subordinates when resolving issues of a non-official nature;
  - 6) not to force subordinate employees to commit corruption offenses;
  - 7) prevent and suppress violations of the anti-corruption legislation of the Republic of Kazakhstan by subordinates and other employees;
  - 8) timely take comprehensive measures to resolve a conflict of interest that arises with a subordinate employee in the course of performing his official duties;
  - eliminate the causes and conditions conducive to the commission of corruption offenses by subordinates;
  - 10) set an example to subordinate employees with their impeccable behavior.
- 7. Managers at all levels ensure compliance with Anti-Corruption standards and organize anticorruption work among employees subordinate to them.

# Appendix 2

to the Anti-Corruption Policy

# STATEMENT

# on the adoption of anti-corruption restrictions

	(Full name)
	(job title)
inte that	rder to comply with the requirements of the anti-corruption legislation of the Republic of Kazakhstan strongly of the Assakhstan Stock Exchange JSC in the field of anti-corruption, preventing actions at may lead to the use of my official powers in personal, group and other non-official interests, I accept in-corruption restrictions on:
1)	carrying out activities incompatible with the performance of my functions;
2)	the inadmissibility of joint work of persons with close relatives, spouses and in-laws;
3)	use of information not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
4)	accepting gifts in connection with the performance of official powers in accordance with the legislation of the Republic of Kazakhstan;
5)	opening and owning accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, storing cash and valuables in foreign banks located outside the Republic of Kazakhstan.
	(last name, first name and patronymic, signature, date)