



**CODE OF ETHICS AND COMPLIANCE
INSTITUTE OF HIGH TECHNOLOGIES LLP
(approved by the resolution of the Supervisory Board of the
Institute of High Technologies LLP dated February 23, 2023 No. 3-23)**

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The Code of Ethics and Compliance of the Institute of High Technologies LLP (the Code) is a basic component for achieving the Company's strategic goals.

Everything we do today should be aimed at creating a better future, so the Code is designed to help employees understand the Company's values and the importance of the actions we take, the objectives we set and our responsibilities in doing business.

The Code is mandatory for all employees of the Company. We should strive to follow it.

Company values

The driving force of the Company is the corporate values that we follow. They are the basis of the corporate culture of the Company, form the unity of views and actions of employees, contribute to the effective achievement of the Company's goals.

- Safety**
 - ✓ Safety is our habit
 - ✓ Each of us is personally responsible for safety
 - ✓ We maintain a safety culture through standards and behavior
 - ✓ We take care of the environment

- Professionalism**
 - ✓ We are leaders in the industry
 - ✓ We possess and share unique knowledge and experience
 - ✓ We effectively achieve our goals
 - ✓ We make informed decisions

- Responsibility**
 - ✓ Each of us is personally responsible for the result of our work
 - ✓ We care about the future and are responsible for the decisions we make
 - ✓ We value the reputation of the Company
 - ✓ We are honest with each other, partners, suppliers and consumers

- Development**
 - ✓ By developing ourselves, we are developing the Company
 - ✓ We promote innovation
 - ✓ Keeping the best, we develop new business directions
 - ✓ We are improving technology

- Team**
 - ✓ We respect the opinion and appreciate the contribution of everyone
 - ✓ We help each other
 - ✓ We are working for the overall result
 - ✓ The experience and energy of generations create an effective team

This means that:

- we are experimenting, looking for new approaches to solving the tasks and introducing new technologies;
- we act boldly and do not miss new opportunities, anticipating the needs of customers;
- we challenge the established rules and find new ways to solve the tasks set;
- we report problems, share ideas and encourage others to cooperate with the corresponding tasks.

Introduction

1. The coordinated work of our team is the way to achieve the strategic goals and objectives set by the Company. The development of our business also depends on the quality of the work we do, compliance with the established rules and relentless fight against violations and prevention of them in the future.

2. The Company believes that its employees put all their strength, knowledge and experience in their professional activities, faithfully and properly perform the duties assigned to them by the Company.

3. By embodying the Company's values and following this Code, each of us contributes to innovation in building partnerships and fostering performance. The Company's values and this Code serve as a guideline for the Company's employees when building relationships with partners, suppliers, consumers and other stakeholders of the Company.

4. The Company's management understands that compliance with this Code brings more long-term benefits for the Company compared to the benefits that can be obtained as a result of actions taken in violation of this Code in the short term.

Compliance with the provisions of this Code is the responsibility of all employees of the Company, regardless of their position.

5. The provisions of this Code should be applied in all areas of the Company's activities and types of employee relationships, both among themselves and with partners, suppliers, consumers and other stakeholders of the Company.

6. This Code has been prepared in accordance with the strategic goals and mission of the Company, the legislation of the Republic of Kazakhstan, international legal norms, generally accepted norms of business culture, as well as internal documents of the Company.

This Code does not cancel the validity of other internal documents of the Company regulating the Company's activities.

The Code, being a guide in work, regulates ethical principles and regulations in the field of compliance of the Company, establishes rules of conduct for the Company and its employees.

7. The Company welcomes mutual understanding and support among colleagues, which allow them to make informed decisions. If an employee of the Company needs to receive advice, assistance, clarification regarding the provisions of this Code, he/she should contact his/her direct supervisor, superior manager, Ombudsman or Risk and Compliance Officer.

8. Non-compliance with the Code may cause significant damage to the Company's activities and reputation. Employees of the Company, if they become aware of non-compliance with the provisions of this Code, Anti-Corruption legislation, regulatory requirements and/or internal procedures, should inform their immediate supervisor, superior manager, Ombudsman or Risk and Compliance Officer about this as soon as possible, or by contacting an External Independent Organization ("to the hotline operator"), including on an anonymous or confidential basis.

The current contact details of an External Independent Organization ("hotline operator") are posted on the official Internet resource of the Company.

9. Employees who report violations will not be subjected to any negative treatment or punishment in any way. Employees are provided with full protection of their rights and interests, including the preservation of their workplace. At the same time, employees who act in bad faith or make accusations in order to obtain personal gain and/or with malicious intent may be held liable under the legislation of the Republic of Kazakhstan and internal documents.

10. The members of the Supervisory Board fully support this Code and follow its provisions. The Risk and Compliance Officer of the Company reports to the Supervisory Board of the Company on the identified facts of non-compliance with this Code. The provisions of this Code are reviewed every two years and updated if necessary.

11. This Code is presented in Kazakh and Russian languages on the official Internet resource of the Company. Also, the Company's internal documents are posted on the official Internet

resource of the Company, additionally explaining the provisions of this Code, compliance with which is mandatory or recommended for third parties - stakeholders of the Company.

12. The following terms and concepts are used in this Code:

1) **Anti-corruption legislation** - anti-corruption legislation, including the Criminal Code of the Republic of Kazakhstan, the Code of Administrative Offences of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan "On Combating Corruption", the UK Law on Bribery and other applicable anti-corruption legislation;

2) **close relatives** – parents (parent), children, adoptive parents (adoptive parents), adopted, full and half siblings, grandfather, grandmother, grandchildren;

3) **External independent organization** ("hotline operator") - an external independent confidential information organization that receives reports on potential, committed or ongoing violations of Anti-Corruption legislation, regulatory requirements, as well as on other issues stipulated by the Confidential Information Policy of Kazatomprom NSC JSC. The hotline operator is available around the clock, seven days a week and has support in Kazakh, Russian and English languages. When applying, the employee or other Associated Person must indicate the language that he/she would like to use;

4) **dress code** - a requirement for the appearance of the Company's employees, the form and style of clothing, the main function of which is to show the Company's employee from the best side as responsible, neat and attentive;

5) **Closed period** – the period during which transactions with the Company's securities are prohibited to persons with access to insider information;

6) **insider information** – has value as defined in the Order on approval of the list of insider information of the Institute of High Technologies LLP;

7) **Company** - Institute of High Technologies Limited Liability Company;

8) **Conflict of interest** - a situation in which a Company employee, in the performance of his or her official duties, makes a decision, participates in decision-making or performs other actions related to his or her position that affect or may affect the personal or material interests of the employee, his or her close relative, spouse, relative, and that affect or may affect the interests of the Company

9) **Corporate fraud** (in the context of this Code) – actions or omissions of individuals and/or legal entities (in cases provided for by Applicable Law) in order to obtain personal benefit and/or benefit of another person to the detriment of the interests of the Company and/or cause material and/or non-material damage to the Company by deception, abuse by trust, misrepresentation or otherwise. Corporate fraud manifests itself in the form of misrepresentation of financial statements, corruption, as well as embezzlement and other abuses, including intentional damage and other violations of the Company's assets.

10) **Indirect subordination** – controlled subordination of one subject (employee) to another subject (senior employee), regardless of direct subordination. With such subordination, any of the senior employees has the right to give orders to the Company's employees personally or through his direct supervisor and to demand the execution of these orders both personally from the employee and through his direct supervisor;

11) **Ombudsman** – the Company's Ombudsman;

12) **Partners** – legal entities the Company cooperates with in order to obtain mutual benefits, achieve strategic goals, etc.;

13) **Procurement procedure of Samruk-Kazyna JSC** – the procedure for procurement by National Welfare Fund "Samruk-Kazyna" Joint-Stock Company and legal entities with fifty or more percent of voting shares (participation interests) directly or indirectly belong to Samruk-Kazyna JSC on the right of ownership or trust management;

14) **Suppliers** – an individual engaged in entrepreneurial activity, a legal entity (with the exception of state institutions, unless otherwise established for them by the laws of the Republic

of Kazakhstan), a temporary association of legal entities (consortium) acting as a counterparty in a contract concluded between the Company and him on the procurement of goods, works and services for the needs of the Company;

15) **Consumers** – persons intending to order or purchase or ordering, purchasing and (or) using goods from the Company;

16) **Management** – Company's Management;

17) **Direct subordination** - the direct subordination of one subject (employee) to another subject (senior employee). With such subordination, the managing employee has the right to give orders to the subject subordinate to him/her and demand the execution of these orders;

18) **Employee** – a natural person who has an employment relationship with the Company under the terms of an employment contract;

19) **Managers** (in the context of this Code) – the General Director of the Company, Deputy General Directors of the Company, heads of business units of the Company.

20) **Management** – the first Head of the Company, employees holding positions directly subordinate to the first Head of the Company;

21) **Risk and Compliance Officer** – Risk and Compliance Officer of the Company;

22) **Relatives** – full and incomplete brothers and sisters, parents and children of the spouse.

23) **Supervisory Board** – the Supervisory Board of the Company.

Section 1. Ethics

Chapter 1. Compliance with high standards of personal behavior

1. The Company believes that doing business in compliance with ethical principles is an integral element of its long-term success. The Company maintains the highest standard of ethical behavior in its day-to-day operations, which is an essential part of its approach to doing business.

2. All employees of the Company follow the high standards of personal behavior accepted in society and corresponding to the responsibilities and traditions established in the Company. High standards of personal behavior imply that employees of the Company adhere to the principles of honesty, integrity, impartiality and respect not only in their work and communication with colleagues, partners, suppliers, consumers and other stakeholders of the Company, but also in everyday life.

3. Compliance with high standards of personal behavior and maintaining the business reputation of the Company is one of the main tasks of its employees. In the process of fulfilling their work duties, the Company's employees are constantly guided by the provisions of this Code, following them in their professional activities and interpersonal interaction at the workplace.

Chapter 2. Respect for every person

1. The Company's employees build relationships based on mutual respect for each other, behave correctly and professionally towards shareholders, partners, suppliers, consumers and other stakeholders of the Company both in the Company's office and outside it, fulfill orders in a timely manner and demand the same attitude from others.

2. The company has a multinational staff, so colleagues need to take into account the existing differences in language skills and national culture.

Diversity of views leads to more favorable communication, which has a fruitful effect on working with shareholders, partners, suppliers, consumers and other stakeholders of the Company, both in Kazakhstan and abroad.

3. The Company makes personnel decisions based on business qualities and merits, based on the labor legislation of the Republic of Kazakhstan. The Company provides equal employment opportunities to all applicants, regardless of origin, social, official and property status, gender, race, nationality, language, attitude to religion, beliefs, place of residence, age or physical disabilities, membership in public associations or other circumstances.

4. The Company's management undertakes to provide equal opportunities to employees in matters of recruitment, remuneration, promotion, classification, training, retraining, internships and other working conditions.

5. The company also provides acceptable working conditions for qualified specialists with disabilities.

Chapter 3. Anti-harassment policy

1. The legislation of the Republic of Kazakhstan prohibits discrimination in the sphere of work. Everyone has equal opportunities to exercise their labor rights and freedoms in the field of labor, except in cases and in accordance with the procedure provided for by the legislation of the Republic of Kazakhstan.

No one may be subjected to any discrimination in the exercise of labor rights on the grounds of origin, social, official and property status, gender, race, nationality, language, attitude to religion, beliefs, place of residence, age or physical disabilities, membership in public associations or other circumstances.

2. The Company considers harassment or abusive behavior, both verbal and physical or visual, to be categorically unacceptable.

Threats, violence and physical humiliation are categorically unacceptable. The company will not tolerate any harassment in the workplace, including sexual harassment, moral violence and aggressive behavior.

3. By prioritizing justice, equality, respect and dignity and avoiding discrimination, harassment and aggression, the Company provides every employee with security and confidence that he/she will be able to fully reach his/her potential.

4. The Company upholds the dignity of employees in the workplace, regardless of whether the offender or victim is an employee, manager, partner, supplier, customer or visitor to the Company.

5. The Company urges not to conceal the facts of violations of the psychological climate in the team, including when the behavior of colleagues causes inconvenience, when an employee witnesses the unworthy behavior of a colleague in the workplace, when threats and/or harassment and/or violence are committed against the employee. The Company sets high standards of proper behavior of employees and their responsibility for violations committed.

6. If it is not possible to resolve the situation with the person who directly committed such an offense, the employee should contact the Ombudsman or the Risk and Compliance Officer.

Chapter 4. Industrial safety

1. A safe and healthy working environment not only protects and strengthens the trust of the Company's employees, prevents accidents that lead to serious losses, but also contributes to the creation of the Company's reputation as an organization with high social responsibility.

2. The Company pursues a policy in the field of occupational safety and health of employees, industrial safety, environmental protection, nuclear and radiation safety, defining the main intentions and activities of the Company's management in this direction, as well as the behavior that it expects from its employees. The Company's employees are responsible for ensuring the safety of the workplace, thereby helping to promote a culture of health and safety, as well as taking responsibility for their own safety, the safety of their colleagues and business partners.

3. Ensuring occupational safety and health of employees is the main priority of the Company. The company strives to comply with the best international practices, strictly comply with national and international requirements and constantly improve the industrial safety management system.

4. When carrying out production activities, the Company is fully aware of its responsibility to stakeholders for creating and maintaining safe working conditions for employees, ensuring the safety of other persons related to the Company's activities, fully maintaining environmental safety and preserving the natural environment in the places where the Company's production activities are carried out, strives to achieve zero level of injuries and zero level of environmental impact.

5. In order to eliminate dangerous working conditions and to protect the Company's employees, it is necessary:

1) ensure the priority of human health and environmental protection in relation to the result of production activities;

2) follow the legislation of the Republic of Kazakhstan and the Company's internal documents regulating the issues of occupational safety and health of employees, industrial safety, environmental protection, nuclear and radiation safety;

3) ensure the commitment of managers at all levels of the Company in the implementation of industrial safety programs;

4) know and follow all the Company's safety rules and procedures;

5) improve the industrial safety management system in accessible technical and administrative ways;

6) prevent industrial accidents and minimize possible consequences;

- 7) pass all mandatory preparatory courses or on-the-job training that develop the ability of employees to safely perform their work duties and operate corporate equipment;
 - 8) know how to safely and legally handle hazardous materials and how to dispose of them;
 - 9) require all colleagues, partners, suppliers and consumers to comply with security;
 - 10) ensure awareness of stakeholders and transparency of information about the state of industrial safety;
 - 11) apply the best international industry practices in ensuring industrial safety.
6. The Company's employees contribute to ensuring safety in the workplace:
- 1) reporting detected dangerous conditions (DC), dangerous actions (DA) and incidents without consequences – Near Miss (NM);
 - 2) conducting behavioral security audits (BSA);
 - 3) applying the right to suspend unsafe work through the "STOP Card" procedure;
 - 4) participating in training and training activities on industrial safety;
 - 5) eliminating hazards and reducing risks in the field of environmental protection, health protection and occupational safety, critically treat and analyze each incident in detail, drawing appropriate lessons in order to prevent similar cases in the future.

Chapter 5. Confidentiality and protection of personal data of employees

1. The Company respects the right of employees to confidentiality and strives to ensure the confidentiality and protection of all personal data that it has. Employees must comply with procedures related to the security of processing and protection of personal data of other employees of the Company.

2. Working in the Company, employees agree to the use of their personal data for processing and transmitting information about the Company's employees both inside and outside the Company in accordance with the legislation of the Republic of Kazakhstan, including for processing salary payments and fulfilling other personnel requirements.

At the same time, the Company undertakes to take appropriate security measures to protect personal data and ensure that it prevents any cases of intentional, accidental or unauthorized access to them.

Chapter 6. Service ethics

1. The service ethics of the Company's employees is based on compliance with the principle of legality, a sense of duty and responsibility for the assigned task. The basic norms of official behavior are honesty, decency, discipline, conscientiousness, punctuality, modesty, politeness and accuracy.

2. In their daily activities, the Company's employees observe high ethical standards, including:

- they respect the opinion of their colleagues, openly and kindly discuss problems that have arisen in the course of work, on the principles of equality, solidarity and partnership;
- do not allow offensive, oppressive or obscene behavior, including on the basis of origin, social, official and property status, gender, race, nationality, language, attitude to religion, beliefs, place of residence, age or physical disabilities, membership in public associations or other grounds;
- they do not allow familiarity in business relations, are correct and polite when communicating by phone;
- avoid discussing issues related to wages, career growth, their obligations, with colleagues;
- observe the dress code;
- they do not allow the use or communication to other employees of the Company of false, untruthful or incomplete information about themselves, their activities, where full disclosure of

information is required according to the legislation and/ or internal documents of the Company, as well as about their close relatives.

3. In the performance of their official duties, an employee of the Company makes decisions only within their competence in accordance with the job description. If the solution of the issue exceeds his competence, the employee turns to his immediate supervisor.

4. Every employee of the Company strictly observes labor discipline, uses working time rationally and efficiently, performs his official duties conscientiously, impartially and qualitatively.

5. The Company encourages the employee's desire to improve their professional level and qualifications for the effective performance of official duties.

6. Each employee takes care of the Company's property, ensuring its safety, rational and effective use for official purposes.

7. In the course of work, an employee, regardless of his/her position, ensures transparency, legality and fairness of decision-making, opposes actions that harm the interests of the Company, hinder or reduce the efficiency of the functioning of its structural divisions.

8. The Company's employees make every effort to avoid unscrupulous behavior that may harm the Company's reputation or involve the Company in illegal or questionable, from the point of view of business ethics, activities.

9. Employees are not entitled to use their official position to influence the activities of state bodies, organizations, civil servants and other persons when resolving personal issues or issues in the interests of the Company.

10. Working in the Company, employees are loyal to it, do not allow unreasonable negative statements about the Company or in any way discrediting its reputation in front of third parties. Employees of the Company are not entitled to transmit such information to the media or make negative comments on social networks, forums, emails or other social services. However, employees are not prohibited from constructive criticism for official purposes in order to improve the Company's activities within the Company itself.

Chapter 7. Responsibilities of managers

1. The Company's managers demonstrate their absolute commitment to the norms of this Code by their behavior, playing a crucial role in creating a culture of transparency, open communication and trust, which extends from colleagues to partners, suppliers and consumers of the Company. To this end, Managers should:

- adhere to the Company's values in everyday affairs;
- responsibly and readily consider the oral and written information of subordinates about problems in the work and take appropriate measures;
- know the laws, internal documents of the Company used in working with subordinates;
- personally eliminate the problems that have arisen or, according to the circumstances, transfer information about regulatory and legal compliance problems to top managers for consideration;
- highlight and encourage solutions that give preference to the Company's values and long-term success over short-term benefits;
- regularly discuss with subordinates the importance of ethics and compliance with legislation and internal documents of the Company;
- do not prevent colleagues and other employees from contacting management, the Ombudsman or the Risk and Compliance Officer.

2. Managers must demonstrate an equal attitude to the Company's employees, not allowing a biased, biased assessment of the work of any of the employees, regardless of whether they are in direct or indirect subordination or lack of subordination at all.

Chapter 8. Means of communication

1. The company provides its employees with means of communication only for business purposes, this is:

- computers;
- fixed and mobile phones;
- email systems;
- portable devices, fax machines;
- systems that provide interaction through social services;
- internet access;
- other means of communication.

2. Employees of the Company may not use the means of communication to view, receive or send inappropriate materials or materials that may be offensive to colleagues. In particular, they may use communication systems to transmit messages of inappropriate or obscene content to third parties.

Chapter 9. Protection of information of partners, suppliers and consumers of the Company

1. The company protects the private, personal or confidential information of partners, suppliers and consumers with whom it cooperates, as carefully as its own. This includes the understanding and execution of the relevant agreements concluded with the Company's partners, suppliers and consumers, and the Company's current confidentiality provisions.

2. The Company's employees do not discuss or disclose information about the Company's partners, suppliers and consumers both inside and outside the Company, except in cases where they have the appropriate authority to do so. When receiving a request from a representative of another company or the media to comment concerning a partner, supplier or consumer of the Company, it should first to make sure that there is permission from the partner, supplier or consumer of the Company, and also discuss the intended response with a business unit of the Company responsible for public relations issues.

3. Employees of the Company are strictly prohibited from discussing confidential information in public areas (elevators, halls, eating places, etc.).

Section 2. Compliance

Chapter 1. Compliance with the law

1. The high reputation of the Company is based on compliance with the legislation of the Republic of Kazakhstan, international norms, including regulatory legal acts that regulate the conduct of business in those countries with which the Company cooperates with clients. The Company adheres in its activities to the laws governing human rights and standards on occupational health and safety, environmental protection, anti-corruption, fair competition, taxation and reliable presentation of financial information.

2. The Company's employees are obliged to strictly and fully comply with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company. Violation of the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company may serve as a basis for bringing employees of the Company to responsibility.

Chapter 2. Anti-corruption

1. Being a law-abiding and public organization, the Company supports the measures of the Kazakh and international communities to combat corruption and combat bribery.

Corruption causes significant harm to the economic security of the state and society, entails devastating consequences for the country's economy, destabilizes public life, work, and also undermines the trust of the population and the public.

2. The company operates in the domestic and international markets as an organization with high civic responsibility and achieves efficiency through the effectiveness of its efforts and innovations.

3. The Company categorically excludes any form of corruption. In carrying out its activities, this policy is applied by the Company to all areas of the Company's activities, both related to the public and private sector.

4. The Company is committed to combating corruption at all levels and stages of its activities. Strict compliance with this obligation in everyday relations with colleagues and business partners is a guarantee of strengthening the reputation of the Company.

5. The Company excludes the provision or promise of illegal property (non-property) benefits and benefits to partners, suppliers, consumers, government employees or other persons in any country of the world in order to obtain or maintain commercial orders or maintain an improper advantage, both directly and indirectly, including small "incentive" payments to government employees, despite the fact that they can be considered the norm of business turnover in other countries.

6. The Company takes appropriate measures to assure the Company's partners, suppliers and consumers that it does not defend its interests through illegal or unethical measures and actions.

7. The Company sets requirements for all partners, suppliers and consumers on the need to comply with the above standards, seeks to understand the possibility of liability for the actions of the parties that may negatively affect the reputation of the Company. This means that the Company's employees are obliged to:

1) be guided by the principle of legality, the requirements of the Constitution, laws and other regulatory legal acts of the Republic of Kazakhstan and the legislation of other countries applicable to the Company's activities, strictly comply with Anti-Corruption legislation;

2) ensure the observance and protection of the rights, freedoms and legitimate interests of individuals and legal entities;

3) prevent the actions capable of discrediting the Company;

4) inform your direct supervisor or Risk and Compliance Officer about the occurrence of a conflict of interest, personal interest in the performance of official duties, about the inclination to corrupt behavior and receiving gifts;

5) not to be guided by personal and (or) selfish interests in the performance of official duties;

6) refrain from addressing colleagues and managers with unlawful requests that violate the established order of relationships, which may affect the adoption of an impartial official decision;

7) not to incite other employees to commit corruption offenses and not to encourage such actions;

8) not accept gifts due to the performance of official duties that may lead to a conflict of interest;

9) not to use official or other information that is not subject to dissemination in order to obtain or extract property (non-property) benefits and advantages;

10) refuse to be appointed to a position if it is related to the direct subordination (control) of persons who are their close relatives, spouses or relatives, or vice versa, the direct subordination (control) of such employees to persons who are their close relatives, spouses or relatives;

11) be active in combating corruption, in uncovering corruption offenses;

12) immediately inform your immediate supervisor or Risk and Compliance Officer about known facts of corruption, including the inducement to receive any benefit for expedited consideration of materials or facts of red tape;

13) immediately inform your immediate supervisor or Risk and Compliance Officer about doubts about the legality of the order received for execution;

14) contact a top-level management, a Risk and Compliance Officer or an External independent organization ("hotline operator") if the direct manager himself is involved in a conflict of interest;

15) support and demand from colleagues the observance of a high legal anti-corruption culture;

16) take measures on an ongoing basis to eliminate the causes and conditions of possible conflict of interest, corruption offenses and their consequences;

17) refrain from assisting anyone in carrying out entrepreneurial and (or) other activities related to the extraction of income;

18) refrain from representing or lobbying the interests of third parties, as well as performing actions on their behalf;

19) not to use for non-official purposes the means of material, technical, financial and information support, as well as other state property and official information.

8. The Company does not use third parties to indirectly offer or implement illegal property (non-property) benefits and benefits to government employees or employees of state-owned enterprises, employees of partners or consumers of the Company.

9. The Company, when hiring a person who will act on behalf of the Company when working with third parties, must make sure that such a person has a good reputation and appropriate qualifications.

10. The Company does not involve third parties to perform actions that are unacceptable in the Company with legal or ethical standards.

11. The Company carefully hires employees taking into account the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company. This includes checking the accuracy of information in job applications, including information about the existence of facts (for example, cases of corruption crimes) that do not allow them to work in the Company.

12. Since a number of countries the Company operates with have laws that prohibit bribes to foreign officials and require accurate record-keeping, the Company complies with these laws as they relate to its operations and also takes into account local anti-corruption laws in the countries where it does business.

Chapter 3. Restrictions on close relatives, spouses and in-laws working together

1. Managers may not hold positions that are both directly and indirectly subordinate to positions held by their close relatives and (or) spouse as well as relatives.

2. When performing their official duties, managers must not allow both direct and indirect subordination to their close relatives, spouse, in-laws, both within the Company and in separate subdivisions of the Company.

3. The joint work of close relatives, spouses and relatives within the same business unit of the Company is not allowed if, according to the functional duties specified in their job description and/or the organizational structure of the Company, one of them is directly subordinate to the other.

4. In identifying the cases specified in paragraphs 1-3 of this Chapter, the employee is obliged to act in accordance with the procedure regulated by Chapter 12 of this Code and the Regulation on the Settlement of Corporate Conflicts and Conflicts of Interest of the Institute of High Technologies LLP.

Chapter 4. Active, fair and open competition

1. The legislation of the Republic of Kazakhstan prohibits any agreements with individuals if such agreements restrict competition.

2. The Company conducts business with partners, suppliers and consumers in good faith, does not use manipulation, concealment of information, dissemination of negative information, abuse of non-public information, incorrect presentation of facts or other unfair actions in the field of business to achieve its goals.

3. Anticompetitive methods of activity harm partners and complicate the work of markets, cause serious damage to partnerships, violating the underlying trust.

4. The Company treats shareholders, competitors, partners, suppliers and consumers fairly and with respect, as a result of which:

- complies with the legislation in the field of competition protection of the Republic of Kazakhstan and, if applicable, other states;

- acts transparently and directly when concluding contracts, proceeds from the advantages of suppliers and clearly defined comparative indicators, taking into account the requirements of applicable procurement procedures (for example, the Procurement Procedure of Samruk-Kazyna JSC);

- provides accurate and timely documentation;

- carries out truthful and accurate marketing and advertising activities. It is not allowed to use deliberately false messages, conceal important facts or make false statements about the Company or about existing competitors;

- particularly careful in its comparative statements, not allowing unfair criticism of competitors' products or services;

- does not use illegal or unethical methods of collecting information about competitors;

- does not discuss prices or any issues related to prices with competitors for the purpose of collusion regarding prices, tariffs or establishing other business conditions in the market in which the Company competes.

5. The Company does not negotiate with competitors in order to:

- price manipulation;

- section of sales opportunities or territories;

- conclusion of an agreement on refusal to poach partners, suppliers and consumers;

- boycotting or refusing to sell a product to a certain consumer;

- unfair victory in the tender;

- exchange of confidential information about pricing policy, profits, costs, terms and conditions of sales, loan terms, marketing and strategic plans, mergers or acquisitions, as well as any other important business information.

6. Since the Company often conducts business negotiations with partners, suppliers and consumers, employees should seek the advice of a Risk and Compliance Officer before taking any actions that may be perceived by others as infringing on competition.

Chapter 5. Internal control and disclosure of information. Ensuring the accuracy and completeness of financial documentation

1. When each of the Company's employees assumes responsibility for ensuring the accuracy and completeness of the financial documents with which the Company works, thereby he ensures the protection of its reputation as a bona fide company and confirms the Company's obligation to comply with the trust provided. Reliable reporting allows the Company's shareholders to fairly assess the effectiveness of the Company's activities, which provides management with the information required for the most efficient allocation of resources and prevents violations.

2. The Company draws up accurate, reliable and timely documents for shareholders, investors, the Supervisory Board, government agencies and other persons. This means that the Company's employees:

- are responsible for the completeness, accuracy and correctness of filling in or compiling accounting books and documents for all types of accounting, including time sheets, sales documents and cost reports;
- do not keep unregistered, hidden or shadow records;
- do not forge or distort documents and information about any transactions;
- register transactions in a timely manner and disclose information about them, providing accompanying documentation;
- conduct proper checks before reflecting transactions or expenses or signing documents;
- are aware of the importance of internal control measures and consistently comply with them;
- pay expenses related to the Company's activities from the Company's funds only with the permission of the direct manager;
- ensure the completeness, accuracy, timeliness and clarity of information disclosed in public statements and reports or documents sent to the bodies regulating securities transactions and stock exchanges;
- timely prepare information intended for disclosure in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Company.

3. The Company's internal control system is designed to provide guarantees and provide relevant information to the Supervisory Board, senior management and employees of the Company, as well as interested parties that the processes ensure efficient and productive activities, reliable reporting, compliance with internal documents of the Company and the legislation of the Republic of Kazakhstan.

4. The reliability of the Company's financial and business information forms the basis for the lawful and effective conduct of operations in accordance with the legislation of the Republic of Kazakhstan, applicable international financial reporting standards, generally accepted accounting and management accounting principles.

5. The reliability of the Company's financial statements is ensured by several control mechanisms, including the application of accounting principles, policies, rules and procedures set out in the Company's instructions, as well as regulations, accounting and reporting guidelines, and internal control.

6. The Company's management guarantees the reliability of the data reflected in the accounting and reporting systems, full compliance of the information to be published with the results of the reporting period and the financial condition at the end of the period.

7. Employees of the Company at all levels of activity should ensure that all records, reports or information that they use or transmit to the heads of the relevant structural divisions allow the Company to carry out full, reliable, accurate and timely disclosure of information in reports, documents and other public communications. Such documents issued in any form include financial and management reports and forecasts, research reports, marketing information, sales reports, tax reports, social information, environmental information and other documents, including those submitted to government agencies.

8. The financial or business information of the Company should not be the object of fraudulent actions.

Corporate fraud also includes: the provision of false documents and reports, their forgery or modification, misappropriation or improper use of Company property, unauthorized transactions or payments of large amounts, misuse of small amounts (for example, representation or travel expenses), recording or issuing financial statements that do not comply with appropriate standards accounting and reporting.

A more detailed list of examples of corporate fraud is given in Appendix 2 to the Policy of the Institute of High Technologies LLP on Combating Corruption and Fraud.

9. Employees engaged in public disclosure of information on behalf of the Company must in good faith ensure the completeness, objectivity, accuracy and timeliness of information disclosure.

10. The Company requires compliance with the legislation of the Republic of Kazakhstan, generally accepted principles of all types of accounting, internal documents of the Company, as well as compliance with international auditing standards. The Company's employees are required to maintain and submit the Company's primary documentation, as well as reporting based on this documentation, in accordance with the legislation of the Republic of Kazakhstan. This documentation and reporting must accurately reflect the assets, liabilities, income, expenses and contingent liabilities of the Company.

11. The Company's employees undertake to report in good faith problems concerning questionable accounting methods, auditing, disclosure of information or control measures.

The Company has developed a procedure for dealing with reports, including fraud related to all types of accounting, internal accounting control system, audit issues and information disclosure control measures. The developed procedure includes procedures for receiving, storing and processing such messages, as well as receiving anonymous messages and ensuring confidentiality.

12. The Company's employees should immediately inform the persons or organizations specified in paragraph 9 of the Introduction of this Code about existing complaints and doubts related to:

- fraud or errors intentionally made in the preparation, maintenance, evaluation or study of any reports or documents;
- violation or non-compliance with internal accounting control measures;
- misrepresentation of facts or false statements about financial audits or documents in information from a senior manager or accountant or in documents sent to management or accountant;
- deviation from the requirement to submit complete and reliable statements on the financial position of the Company;
- questionable transactions with partners, suppliers and consumers of the Company;
- forgery or modification of documents by other means;
- invoicing for an amount above or below the agreed product prices;
- payments made for purposes that were not agreed in the contracts;
- payments through intermediaries in ways different from the usual commercial transactions carried out by the Company;
- transfers or deposits to the bank accounts of individuals, and not to the accounts of the organization with which the Company has concluded contracts;
- theft or misappropriation of Company assets;
- oral agreements with partners, suppliers and consumers of the Company or unapproved written agreements not included in the scope of the official contract;
- any actions aimed at exerting undue influence in relation to the payment of commission.

Chapter 6. Creating trusting relationships with Company's suppliers and consumers

1. Suppliers

1.1. The Company's procurement decisions are based on an objective assessment of the reliability and honesty of the supplier, as well as on an overall assessment of the proposal regarding short- and long-term prospects and objectives.

1.2. In the interests of the Company, purchases of goods, works and services are carried out taking into account the advantages in price, quality, efficiency, delivery time and compliance with the necessary requirements.

1.3. Acting as a buyer, the Company strives to prevent the occurrence of a situation of dependence on the supplier and, therefore, systematically expands the range of reliable alternatives. Relations with suppliers are regulated by procedures established by the Company, which aim to treat all suppliers equally.

1.4. The Company takes appropriate measures to avoid conflicts of interest and any expressions of interest. Employees of the Company are prohibited from receiving property (non-property) benefits as a reward for making a decision beneficial to certain suppliers.

1.5. The Company establishes requirements for all suppliers to strictly comply with the legislation of the Republic of Kazakhstan or other applicable legislation (in the case of purchases outside the Republic of Kazakhstan).

1.6. The Company obliges its suppliers to sign the Code of Suppliers and Contractors of the Company, based on the principles of work that the Company adheres to in relations with third parties, including compliance with human rights standards, the prohibition of child labor, occupational safety and health, ethics and compliance rules, in particular, concerning the fight against corruption and fair competition, environmental protection and compliance with all laws and regulations of the Republic of Kazakhstan. The Company takes measures to make sure that these obligations are fulfilled both during the selection process and during the fulfillment of contractual obligations.

1.7. The Company enters into a contract for the provision of services with third parties and thereby authorizes them to represent the interests of the Company on necessary issues, including marketing and sales in a certain territory in relation to certain activities of the Company (hereinafter referred to as Representatives).

1.8. These Representatives can act on behalf of the Company on its behalf, as well as interact with its potential and existing consumers or with government agencies or private companies.

1.9. The Company prohibits any kind of bribery of public or private persons, as well as any illegal or unfair activity in relations with Representatives of the Company with whom the Company has a signed contract.

1.10. The Company does not hire third-party organizations to perform any actions prohibited by the legislation of the Republic of Kazakhstan or this Code.

1.11. To prevent corruption in the public or private sector, the use of the services of Representatives is possible only after approval and a comprehensive legal assessment by the relevant departments of the Company, which is strictly regulated by internal procedures described in the Company's internal documents on relations with trading partners.

1.12. The Company does not use Representatives and other third parties to indirectly offer or implement property (non-property) benefits and benefits as remuneration to government employees or employees of state-owned enterprises.

1.13. An employee who hires a Representative on behalf of the Company when working with third parties must make sure that this Representative has a good reputation and appropriate qualifications.

1.14. The Company strongly recommends receiving written confirmation from this Representative that he will comply with all the requirements of anti-corruption legislation.

2. Consumers.

2.1. The Company carries out its activities with all its consumers equally honestly and fairly, regardless of the size of their enterprise.

2.2. The company undertakes to provide consumers with high-quality products that meet their requirements.

2.3. The company provides detailed information about its products in advertising, public statements and offers to individual consumers.

2.4. Employees negotiating contracts undertake to provide consumers with the completeness and reliability of statements, messages and presentations.

2.5. The Company's employees do not disclose confidential or proprietary information about the consumer. Information about the consumer, project or contract is reported only to those who need this information solely for official purposes.

Chapter 7. Careful selection of partners, suppliers, consumers and colleagues (compliance check of counterparties)

1. Following the applicable Anti-Corruption legislation, the Company carefully selects partners, suppliers and consumers with whom the Company cooperates, including by conducting a compliance check of counterparties. The procedure and procedures for conducting such compliance checks of counterparties are regulated by the Rules for Compliance Verification of Counterparties of the Institute of High Technologies LLP.

2. The Company does not conduct business with those who can undermine its reputation, therefore excludes cooperation with companies or persons who intentionally and/or constantly violate the law.

3. If cooperation with any individuals or legal entities is prohibited by legislative norms or internal documents of the Company, including in cases where these persons are included in the lists of prohibited individuals or legal entities published by state bodies of different states, such cooperation is not allowed by the Company.

4. Employees of the Company are responsible for familiarization with confidential information, basic information, reputation and standards of conduct (to the extent required by circumstances):

- partners;
- consumers;
- suppliers, including companies and persons engaged on behalf of the Company as a Representative or with whom the Company works directly.

5. The Company's employees undertake to make sure that the companies and persons who are engaged by the Company to represent its interests or to provide the Company with goods, works and services comply with the norms of the Code of Suppliers and Contractors of the Institute of High Technologies LLP.

6. The Company's employees are responsible for familiarizing themselves with the Rules for Compliance verification of Contractors of the Institute of High Technologies LLP, for their compliance, as well as for ensuring that partners, suppliers and consumers understand their obligations to the Company and its partners.

Chapter 8. Trade restrictions and export controls

1. The Company does not enter into business relations with government authorities of any country, organizations or individuals, with respect to which a ban (economic or other sanctions) has been imposed. On the issues of finding organizations or individuals under sanctions, employees need to get mandatory advice from a Risk and Compliance Officer.

2. The Company's representatives are also required to strictly comply with all applicable export control regulations of the countries in which they are present (including laws relating to technical support or training). Special attention should be paid to technologies and dual-use goods, including components, software and technological data.

3. The Company's employees dealing with international trade issues monitor compliance with the required procedures for exporting the Company's products, as well as to whom they are sent, who will receive them and for what purposes. Failure to comply with the relevant norms and

requirements may result in the application of strict sanctions for both the Company and its employees, including a ban on further export activities and criminal liability.

4. The Company thoroughly checks potential and existing partners, suppliers and consumers on a regular basis for their presence in the list of persons and organizations with violations that do not allow the Company to cooperate with them.

5. The Company draws attention to disturbing and questionable signs in its work, such as payments through multiple accounts, requests for payments at an unusual time or in excess of the amount, as well as requests for refunds in ways different from those used to make the initial payment.

Chapter 9. Intellectual property rights

The Company respects the intellectual property rights of third parties, thereby the Company does not use:

- unlicensed or unauthorized trademarks in their activities;
- unregistered patents;
- unauthorized copyrighted materials;
- unauthorized software, including not installing programs for personal use on the Company's computers;
- official, confidential information and commercial secrets of third parties.

Chapter 10. Transactions with the Company's securities

1. The Company's internal documents prohibit persons with access to the Company's insider information from making transactions with the Company's securities on the basis of such information or during a Closed Period, as well as providing such information or recommendations on the purchase or sale of the Company's securities to other persons connected by family, family or business ties with them.

2. The principles, systems and controls for preventing transactions with the Company's securities in accordance with paragraph 1 of Chapter 10 of Section 2 of this Code are regulated by the Policy on Transactions with securities of Kazatomprom NAC JSC, the main task of which is to prevent abuse and/or manipulation in the securities market by persons with access to insider information (insider transactions), and, as a result, the protection of the image and legitimate rights and interests of the Company.

3. An employee or other insider of the Company who uses insider information for personal gain or discloses it to other persons without reasonable official necessity violates the interests of the Company. Violation of the legislation of the Republic of Kazakhstan or the applicable legislation of another state (depending on the place of the transaction) in this part entails strict sanctions, which may include significant fines, as well as criminal liability, up to imprisonment against unlawfully acting employees of the Company or other insider.

Chapter 11. External communications

1. Only members of the Supervisory Board, the General Director (or a person acting in his duties or replacing him) and employees of the Company who are specially authorized to do so by the General Director (or a person acting in his duties or replacing him) can speak publicly on important corporate issues.

2. The persons specified in paragraph 1 of Chapter 11 of Section 2 of this Code have the exclusive right to respond to requests from the media or third parties concerning important corporate issues.

3. However, the Code does not prohibit the coverage of issues required in accordance with the legislation of the Republic of Kazakhstan.

4. Press releases and other types of public disclosure of information related to the Company's development are thoroughly checked by employees of the Company's structural divisions in accordance with the Company's internal documents. For cases of a corporate crisis situation, the Company has established separate rules for publishing messages.

Chapter 12. Conflict of interest

1. The ability to recognize and uncover potential conflicts, as well as to establish ways to avoid them, help the Company to protect its reputation and contribute to the effective conduct of business.

2. Conflicts of interest may also arise if employees of the Company perform actions or have interests that make it difficult for them to perform their duties objectively and effectively. In such situations, the Company's solutions, products and services may be at risk.

3. A conflict may also arise if an employee, his/her spouse, relative or close relative, is provided with property (non-property) benefits and advantages, or a spouse, relative or close relative is chosen by the supplier of the Company, taking into account the position of the employee of the Company. An employee of the Company should avoid situations in which the interests of people close to him can influence the decisions of the Company. The family or personal relationships of employees should not affect the performance of official duties or influence the decisions made by the Company.

4. Conflicts of interest may arise as a result, including, but not limited to:

- whether the Company's employees have financial interests in another legal entity with which the Company maintains business relations;
- ownership of employees or their close relatives, spouses, relatives of shares (shares) of other legal entities;
- part-time work as an official or participation in the work of bodies of other legal entities;
- providing business opportunities to other legal entities, to the detriment of the interests of shareholders and the Company due to personal property interests;
- joint work of spouses, relatives or close relatives in direct and indirect subordination to each other and /or participation in the evaluation of the activities of such close relatives, spouses, relatives.

A conflict of interest may be regarded as a situation in which an employee or his/her close relative, spouse, relative owns more than 1% of the shares of legal entities that are partners, suppliers, consumers or competitors of the Company.

5. If a conflict of interest arises, the employee must disclose it to his or her supervisor, explain exactly what it is, and refrain from participating in decision-making on those issues that involve that interest.

6. A decision on the settlement of a conflict of interest is made in one of the following ways:

- 1) the employee's disclaimer of personal interest, which is a source of a conflict of interest;
- 2) prohibition of the employee's use of information that is an object of his or her personal interest;
- 3) permanent or temporary suspension of an employee from discussing and resolving issues that give rise to a conflict of interest, on a voluntary or directive basis;
- 4) changes in his or her job duties in consultation with the employee;
- 5) transfer of an employee to a position that is not related to the conflict of interests that has arisen, if the employee agrees, in accordance with the procedure established by the labor legislation of the Republic of Kazakhstan.

7. If an employee fails to disclose a conflict of interest and/or fails to take steps to prevent or resolve a conflict of interest to which he or she is a party, disciplinary action will be taken.

8. In order to prevent conflicts of interests, an individual who was previously a civil servant and who, by virtue of his official functions, had the authority to control and supervise the Company's activities from the state, may not be elected to the executive body of the Company within two years from the date of termination of such powers.

9. Employees may not compete with the Company or allow their actions on behalf of any of the Company's business units to be influenced by personal or family interests.

10. In order to prevent a conflict of interests in the Company, it is not allowed:

- personal interest in a transaction with the Company or a transaction in which the Company participates on behalf of a partner, supplier or customer;

- owning a significant interest or having other business interests (including employment or membership of a supervisory board) in a company that is a competitor, partner, supplier or customer of the Company or in an organization that cooperates or seeks to cooperate with the Company;

- participation in companies in which the Company has or may have some interest: ownership or acquisition of an interest in property (real estate, securities or other property) in which the Company also has or may have an interest;

- the provision or receipt by an employee of the Company of property (non-property) benefits and advantages intended to influence the employee, company or government employee and to obtain from them such actions that would contribute to obtaining an unlawful advantage for the Company or for the employee of the Company personally.

11. Employees of the Company, regardless of their position, are prohibited from using for personal purposes the opportunities that may open up when using corporate property, information, their position in the Company or as part of the performance of their official duties on behalf of the Company.

Chapter 13. Prohibition on accepting gifts

1. Receiving, as well as providing gifts, services, dinners, entertainment (the Gifts) in order to influence decision-making is unacceptable in the Company's work. This means that the Company:

- excludes giving and receiving Gifts in the form of cash;

- excludes the provision and receipt of anything of value if it would oblige the recipient to act in a certain way (or create the appearance of such an obligation) or would put the recipient in an awkward position if the Gift became known to others;

- when interacting with a public official, it excludes the right to offer or accept Gifts;

- ensures compliance with the relevant internal rules governing the activities of the Company's business units regarding the provision or receipt of Gifts.

2. An employee of the Company may not demand or accept property (non-property) benefits and benefits from suppliers or consumers of the Company.

3. In a separate internal document, the Company establishes the procedures and manner of handling Gifts received or given. Employees are required to follow established procedures, including in order to exclude possible conflicts of interest or prevent corruption offenses.

Chapter 14. Cybersecurity

The Company's employees support the Company's efforts aimed at achieving and maintaining the level of protection of electronic information resources, information systems and information and communication infrastructure from external and internal threats, ensuring the sustainable development of the Company in conditions of global competition. This means understanding and complying with information security requirements that ensure the confidentiality, integrity and availability of processed information.

Chapter 15. Minimization of negative impact on the environment

1. The Company strives to reduce the impact of its work on the environment. The solutions developed and adopted for the Company and its partners, suppliers and consumers are based on the principle of environmentally sound development in any life cycle of the Company. This means reducing waste and making the most efficient use of resources when conducting activities.

2. The Company faithfully observes the relevant procedures regarding the handling and disposal of hazardous and biologically hazardous waste, adheres to all requirements for the proper handling of hazardous materials. The Company's employees immediately warn the top management of any situations concerning the release of hazardous substances, improper disposal, as well as all other situations that may harm the environment.

3. Within the framework of the legislation of the Republic of Kazakhstan, the Company pays due attention to the need to protect the environment and avoid creating health problems due to environmental pollution.

4. As part of the implementation of these principles of environmental protection, the Company provides for the relevant provisions in the Code of Suppliers and Contractors of the Institute of High Technologies LLP.

Chapter 16. Child and forced labor

The company opposes child and forced labor and adheres to the following principles:

1) The Company complies with the legislation of the Republic of Kazakhstan and the minimum working age requirements and does not use child labor. Persons under the age of 16 cannot be employed by the Company.

2) The Company does not use illegal child labor, does not cooperate with partners, suppliers and consumers, and also does not enter into joint ventures with organizations that use illegal child labor.

3) The Company does not allow forced labor, including by partners, suppliers and consumers.

Chapter 17. Procurement exclusively in the Company's interests

1. Decisions on procurement and conclusion of contracts are made solely in the interests of the Company and in accordance with the Procedure of Samruk-Kazyna JSC.

2. Procurement procedures in the Company include relevant internal approvals. This makes it possible to ensure the efficiency of business and financial control over expenses, so that business expenses are justified, and the goods, works and services received comply with the declared specification.

3. Each employee of the Company, guided by the principles of rational economy and conscientious attitude to the Company's property, is personally responsible for proper compliance with budget discipline within the approved spending limits.

Chapter 18. Information transparency

The Company adheres to the policy of information openness and transparency of activities for shareholders, employees and other stakeholders of the Company. The Company uses all available sources of information (Internet, print media, press conferences, broadcasting) for free access of all interested parties to the disclosed information about the Company.

Chapter 19. Protection of Company's information, ideas and intellectual property

1. Information, intellectual property and innovative ideas of the Company are its valuable resources. The Company's employees must identify, manage and protect these intangible resources, since their disclosure to competitors can damage the Company's competitive advantages and damage the business.

2. The Company's information, which is official information of limited distribution, is subject to protection from unauthorized use, unlawful disclosure and other unlawful actions with respect to such information, which is determined by the Company's internal documents.

3. The implementation of external relations with the use of information constituting confidential information and commercial secrets of the Company must take place subject to the conclusion of contractual obligations on non-disclosure of confidential information, the signing of a confidentiality agreement and an obligation on non-disclosure of confidential information and commercial secrets of the Company. Transmission, processing, storage and transmission of information marked "Confidential" and "Business secret" in electronic form is carried out in accordance with uniform requirements in the field of information and communication technologies and ensuring uniform requirements.

4. Upon termination of an employment contract with the Company, an employee shall retain the obligation, for a period of three (3) years after termination of employment with the Company, not to disclose any restricted information, which shall be signed by the employee.

5. An employee of the Company is liable to the Company for damage caused as a result of unlawful disclosure of information of limited distribution, including liability for theft of intellectual property, which entails significant fines and criminal prosecution of responsible employees.

Chapter 20. Charitable donations

1. Charitable donations on behalf of the Company or using its financial resources are allowed only in accordance with the procedure established by Samruk-Kazyna JSC and/or the Company for charity, provided that they comply with all applicable regulatory legal acts.

2. The Company does not finance charitable projects in order to obtain commercial advantages. The Company carries out charity, which is legal in accordance with the legislation of the Republic of Kazakhstan and/or Samruk-Kazyna JSC.

3. The Company carries out charity work within the framework of its corporate social responsibility. The provisions of this Code do not apply to cases of charitable contributions and sponsorship carried out by employees on their own behalf.

4. Charity should not lead to a potential or actual conflict of interest.

5. In order to avoid conflicts of interest and prevent potential risks of corruption and/or accusations of lobbying, the Company does not make contributions and donations in support of political parties. Payments to the Governments of the Republic of Kazakhstan and other countries are limited only to payments approved by legislation (taxes, fees, etc.), the Company publishes a report on such payments on the relevant information resources. At the same time, the Company does not restrict its employees with respect to their private contributions to political parties and participation in the activities of political parties and/or movements during their free time from work in the Company, provided that such contributions and activities do not lead to a potential or actual conflict of interests.

6. Before considering the issue of providing charitable assistance, mandatory compliance verification of recipients of such assistance is carried out.

Chapter 21. Sponsorship

1. Sponsorship is part of the marketing strategy and maintaining public relations. It is allowed in compliance with the legislation of the Republic of Kazakhstan and within the framework of the Company's internal processes.

2. Decisions on the involvement of the Company in any sponsorship program must be approved by the authorized body of the Company.

3. Before considering the issue of providing sponsorship, mandatory compliance verification of recipients of such assistance is carried out.

Final provisions

1. The Risk and Compliance Officer carries out corporate training of the Company's employees on a regular basis within the framework of this Code.

2. Within three days after taking office, the employee must be familiarized with the text of this Code in writing and sent by the business unit of the Company responsible for recruitment issues to the Risk and Compliance Officer for instruction. The Risk and Compliance Officer instructs (without prior arrangement) on the standards of the Code and their proper implementation.

3. The members of the Supervisory Board and the Management of the Company, after their election, are obliged to familiarize themselves with the text of this Code and sign an obligation to follow this Code in accordance with the Annex to this Code.

4. Violation of the provisions of the Code may serve as a basis for applying disciplinary measures to employees in accordance with the labor legislation of the Republic of Kazakhstan and internal documents of the Company.

**Annex to
the Code of Ethics and Compliance
Institute of High Technologies LLP
approved by the resolution
of the Supervisory Board of
Institute of High Technologies LLP
dated 23.02.2023
(Minutes #3-23)**

**Commitment to follow the Code of Ethics and Compliance of
Institute of High Technologies LLP**

I, _____
(surname, first name, patronymic (if any))

confirm that I am aware of the provisions of the Code of Ethics and Compliance of the Institute of High Technologies LLP (the Code) and undertake to follow them.

I fully support the provisions of the Code, demonstrate absolute adherence to its norms with my behavior, adhere to the Company's values in everyday affairs and when solving issues related to the competence of the Supervisory Board/CEO of the Institute of High Technologies LLP.

If I have additional questions about the principles and requirements of the Code, I can contact the Risk and Compliance Officer or the Ombudsman.

_____ date, signature