

Approved  
by Decree No.9  
of the Chairman of the Management Board  
JSC NC “KazMunayGas”  
as of January 16, 2017

## **Anti-corruption standards of the employees of JSC “National Company “KazMunayGas”**

1. Anti-corruption standards of the employees of JSC “National Company “KazMunayGas” (hereinafter – KMG) have been developed in accordance with the requirements of the Law of the Republic of Kazakhstan “On Anti-Corruption”), KMG’s Economic Security Policy and are intended to create the atmosphere of intolerance for any form of corruption among the employees through creating a system of valuable and ethical guidelines.

2. KMG employees are advised to:

2.1. upon exercising their rights and legal interests:

- withstand any forms of corruption, prevent law violations or acts, attended by corruption or encouraging the corruption, and prevent any corruption offence;
- based on reliable information on corruption offence, take all necessary measures to prevent and repress such corruption offence;
- shape a legal culture based on the principles of compliance with the law, fairness, integrity and transparency upon performing their official duties;
- when facing baseless public corruption charges, within a month period from the date of discovery, take all measures prescribed by law for its contradiction.

2.2. When developing and making managerial and other decisions, within their competence:

- by their acts and decisions not to tolerate administrative and other obstacles which would hamper the exercise by physical and legal entities of their rights and legal interests. In case of revealing such facts, to take all measures prescribed by law and remove them;
- use all possibilities to prevent economic damage to KMG and avoid initiating the inspections for its own benefit or for the benefit of others;
- not to use their official powers and associated opportunities for receiving personal property and non-property benefit;
- take measures to prevent conflict of interests.

Should there be any conflict of interests, take measures to prevent and settle it in accordance with the law of the Republic of Kazakhstan and KMG’s internal documents.

2.3. In preparation of internal draft documents:

- to carry out analysis and expertise of the received internal documents for identification of corruptogenic facts, that create conditions for the employees to commit unlawful acts of corruption or other unlawful acts and set forth corresponding preventing measures in them;

- to carry out anticorruption monitoring and corruption risks analysis on the previously received internal documents. If there are any corruptogenic factors found in them, to take corrective measures.

2.4. By other interrelations, arising from executing their duties.

2.4.1 Managers in relation to the subordinates are recommended to:

- to exemplify fairness, justice, unselfishness and scrupulous integrity by their behavior;

- to secure observance of the meritocracy principles when dealing with the personnel matters, not to favor employees on the grounds of kinship, fraternity and personal loyalty;

- to show fairness and objectivity by the performance assessment, and also by using incentives or taking disciplinary measures;

- not to use their job position to influence employees' performance when resolving personal issues;

- not to crowd employees into malfeasance, and also deeds incompatible with the generally accepted moral and ethical norms.

2.4.2. Subordinates in relation to the managers are recommended:

- to submit only objective and reliable data when executing tasks, to instantly inform management on the corruption issues in the actions of other employees, counteragents or third parties brought to their attention;

- to prevent manifestation of personal loyalty, pursuance of reaping the benefit and advantages due to their job abilities in relation to the management.

3. KMG's employees are recommended to comply with the restrictions and prohibitions set by the law of the Republic of Kazakhstan on:

- carrying out activities restricted by the law of the Republic of Kazakhstan;

- prohibition of simultaneous working of near relatives, spouses or cousins-in-law;

- using operation or other information that is not subject to officialization in order to derive material or non-material benefits;

- taking gifts relating to execution of internal controls in accordance with the law of the Republic of Kazakhstan.