

SOCIAL RESPONSIBILITY

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**INVESTING
IN THE FUTURE**



- Principle 1.** Businesses should support and respect the protection of internationally proclaimed human rights
- Principle 2.** Businesses should make sure that they are not complicit in human rights abuses
- Principle 3.** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
- Principle 4.** Businesses should uphold the elimination of all forms of forced and compulsory labour
- Principle 5.** Businesses should uphold the effective abolition of child labour
- Principle 6.** Businesses should uphold the elimination of discrimination in respect of employment and occupation

HUMAN RESOURCE MANAGEMENT

GRI 402-1

The human resources policy of NC KazMunayGas JSC was updated in 2024 and serves as a strategic document outlining the key principles, objectives, and directions for managing human capital within the Company. The policy was developed in accordance with the Labor Code of the Republic of Kazakhstan, corporate standards of Samruk-Kazyna JSC, and KMG's Development Strategy for 2022–2031.

Core principles of KMG's HR policy:

- Meritocracy and fairness – ensuring transparency in HR processes and supporting high-potential employees.
- Fostering an engaged culture – collaborative work towards the Company's strategic goals at all levels.
- Social responsibility – upholding labor rights, ensuring safe working conditions, and supporting employees' social well-being.
- Teamwork and creativity – promoting team spirit, initiative, and a creative approach to problem-solving.
- Openness – nurturing a corporate culture of constructive dialogue and feedback.

- Continuous learning – ongoing enhancement of employees' knowledge and skills.
- Gender equality and inclusion – providing equal opportunities and conditions for all employees.
- Succession planning – ensuring knowledge, experience, and values are passed from one generation of employees to the next.

KMG adheres to international labor standards, including the UN Guiding Principles on Business and Human Rights, ILO standards, and the principles of sustainable development.

In case of changes in working conditions, the Company provides written notice to the employee no later than fifteen calendar days in advance. The minimum notification period for significant business changes is four weeks.

The effectiveness of the HR policy is evaluated using indicators such as labor productivity, employee turnover, engagement index, internal promotions, training and development levels, gender balance in management bodies, and other relevant metrics.

WORKFORCE SIZE AND STRUCTURE

GRI 2-7, GRI 2-8, GRI 202-2, GRI 405-1

As of the end of 2024, the total headcount of KMG Group amounted to 49,243¹² employees, representing a 2% increase compared to 2023. By gender, 81% of employees are men and 19% are women, which reflects the specifics of the oil and gas industry, traditionally associated with physically demanding work.

Among administrative and managerial staff, 48% are men and 52% are women. In contrast, among production personnel, women account for only 16%, while men comprise 84%.

The share of senior executives¹³ in regions of operation¹⁴ hired from the local population is 90% (compared to 83% in 2023).

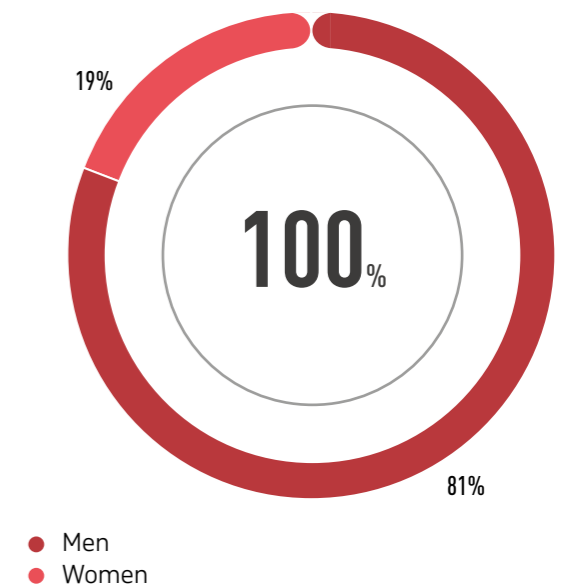
The regions with the highest concentration of personnel are: Mangystau Region (22,026 employees), Atyrau Region (10,605 employees), Pavlodar Region (3,119 employees), and the city of Astana (2,120 employees). A significant number of employees (6,910) work in KMG Group companies located outside the Republic of Kazakhstan.

In 2024, 3,357 individuals were employed under outsourcing arrangements.

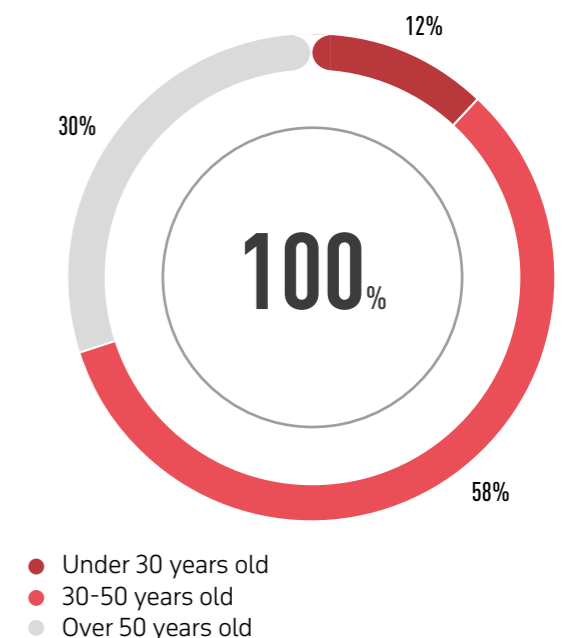
STAFF HEADCOUNT

2024	49,243
2023	48,196
2022	45,764

STAFF STRUCTURE BY GENDER GROUPS AS OF THE END OF 2024



STAFF STRUCTURE BY AGE GROUPS AS OF THE END OF 2024



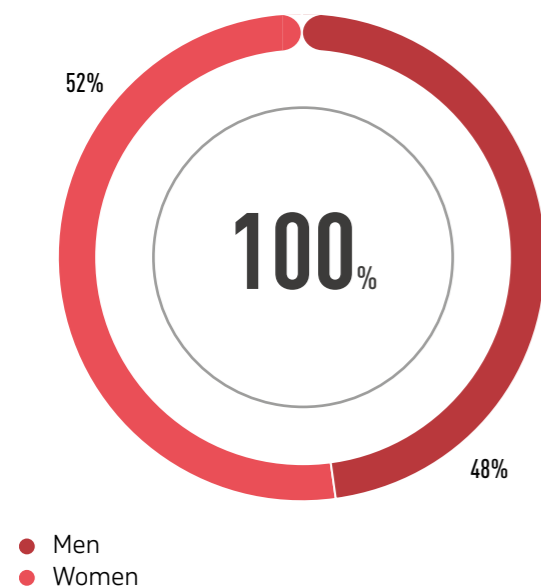
¹² Starting from 2024, the KMG Group accounts for the headcount based on the payroll. In previous reporting periods, the actual headcount was considered. As a result, historical personnel data may differ.

¹³ Senior executive – the first manager and his deputies.

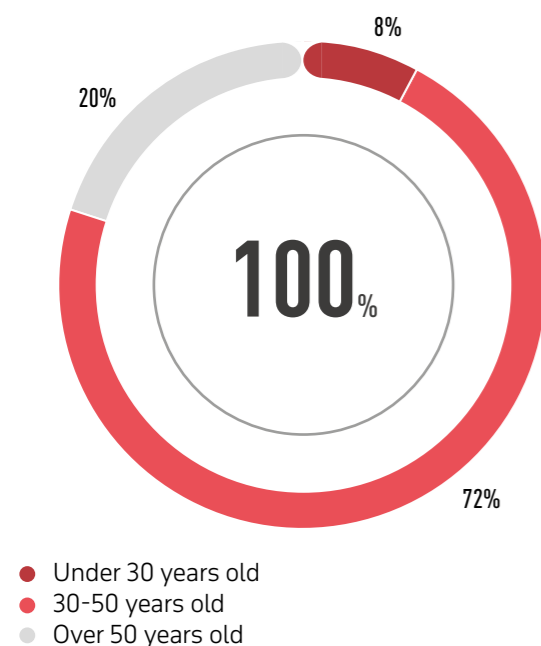
¹⁴ Region of operations – region (region, district) of operational activities.

STRUCTURE OF ADMINISTRATIVE AND MANAGERIAL PERSONNEL AS OF THE END OF 2024

BY GENDER GROUPS

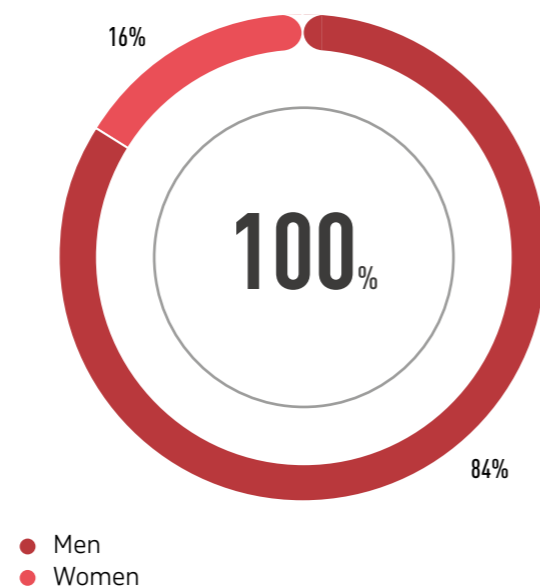


BY AGE GROUPS

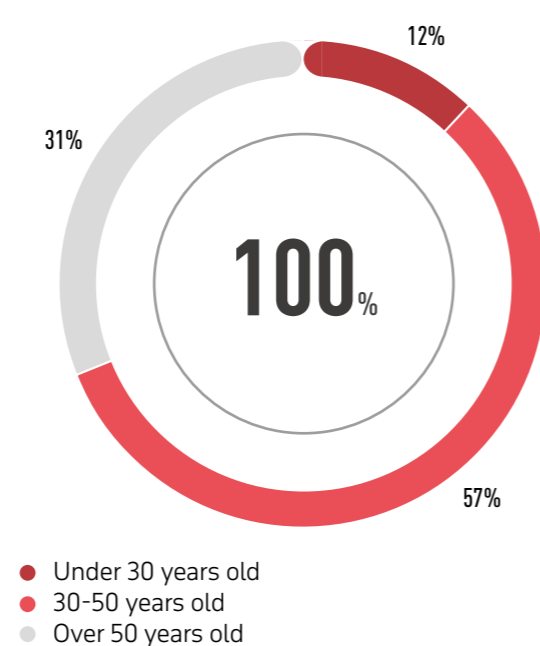


STRUCTURE OF PRODUCTION PERSONNEL AS OF THE END OF 2024

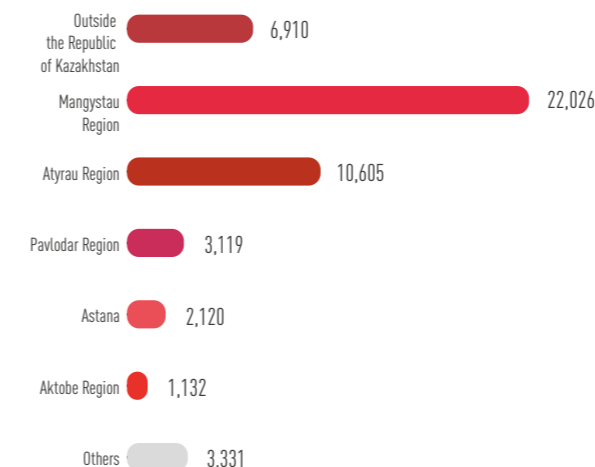
BY GENDER GROUPS



BY AGE GROUPS



EMPLOYEE HEADCOUNT BY REGION AS OF THE END OF 2024, PERSONS



STAFF TURNOVER RATE

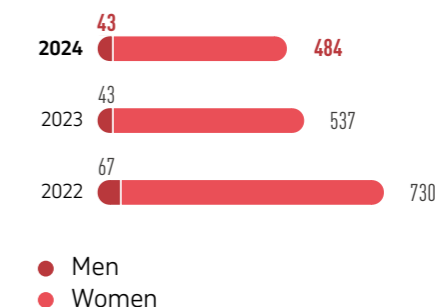


RECRUITMENT AND ONBOARDING

GRI 401-1

Effective human resource management at KMG is based on systematic forecasting of staffing needs, taking into account the Company's strategic plans (in the areas of petrochemical development, strengthening KMG's role in major oil and gas projects, launching production at new fields, energy transition, and carbon footprint reduction).

NUMBER OF EMPLOYEES WHO TOOK MATERNITY LEAVE AND CHILD CARE LEAVE



The staff turnover rate at the end of 2024 was 6.6%¹⁵. A total of 3,272 employment contracts were terminated.

As of the end of 2024, a total of 527 employees were on maternity and parental leave, including 484 women and 43 men. In accordance with the labor legislation of the Republic of Kazakhstan, all employees are entitled to parental leave.

KMG aims to attract highly qualified professionals who meet business requirements. The main approaches to talent acquisition include:

- Promoting the company's HR brand through partnerships with universities, participation in industry events, and career guidance programs.
- Using automated recruitment tools, including corporate platforms (work.kmg.kz, qsamruk.kz) and recruiting services.

¹⁵ In 2024, the KMG Group changed the methodology for calculating staff turnover. In previous years, turnover = A/B*100, where A is the number of employees who quit on their own initiative, by agreement of the parties or through the fault of the employee, at the end of the reporting period; B is the average number of employees for the reporting period. In 2024, turnover = A/B*100, where A is the number of employees who quit on their own initiative, by agreement of the parties or through the fault of the employee, at the end of the reporting period; B is the list number for the reporting period.

- Competitive selection of candidates, with a focus on the internal talent pool within the KMG Group.
- Creating an attractive employee value proposition (EVP) that includes competitive compensation, professional development, and social benefits.

To ensure the successful integration of new and transferred employees, KMG applies a comprehensive onboarding system that includes:

- Corporate onboarding – familiarization with the Company's history, values, strategy, and structure.
- Social onboarding – establishing effective communication within the team.
- Organizational onboarding – learning the company's rules and procedures.
- Technical onboarding – training in the use of corporate IT systems and equipment.
- Professional onboarding – mastering job-related processes and role expectations.
- Psychophysiological onboarding – supporting adaptation to work and rest schedules.

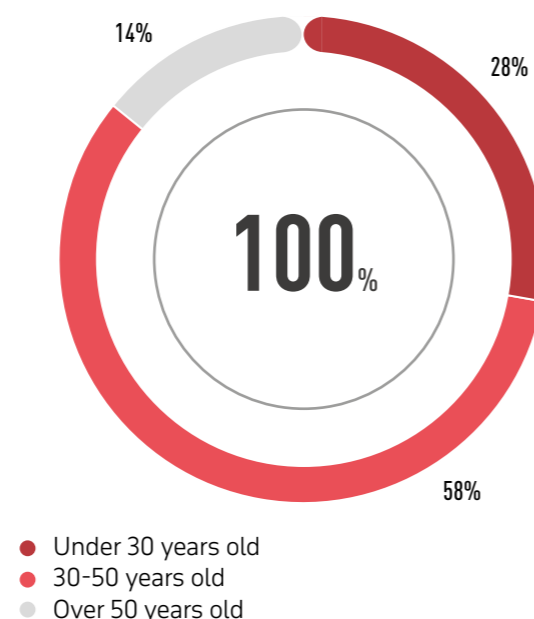
In 2024, KMG hired 3,928 employees. By gender, 82% of new hires were men and 18% were women.

Age group distribution among new hires shows that the largest share falls within the 30–50 years range (58%), followed by those under 30 (28%) and over 50 (14%).

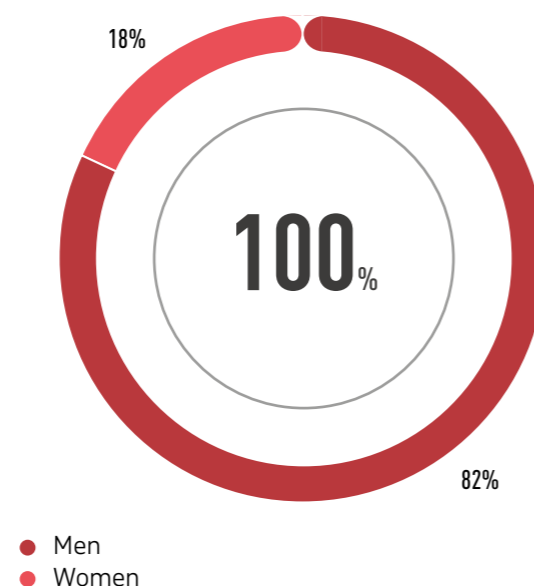
The highest number of new employees was hired in the Mangystau Region (1,037), Atyrau Region (778), Pavlodar Region (224), and Astana (483). A significant number were also hired outside the Republic of Kazakhstan (1,035 employees).

STRUCTURE OF NEW HIRES IN 2024

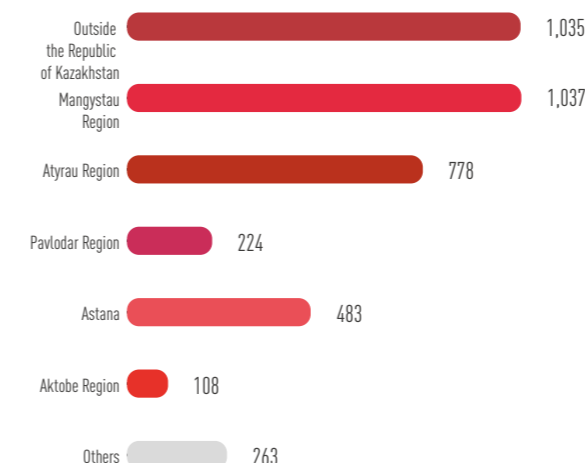
BY AGE GROUPS



BY GENDER GROUPS



NUMBER OF EMPLOYEES BY REGION AS OF THE END OF 2024, PERSONS



TRAINING AND DEVELOPMENT

GRI 404-2, GRI 403-5

Continuous professional development is one of the priorities of the Group's HR policy. KMG invests in employee training in alignment with the strategic needs of the business and modern technologies. The key areas of development include:

- Qualification enhancement, including international certification and the acquisition of additional competencies;
- Management skills training for middle-level managers;
- Training of engineering, technical, and blue-collar personnel;
- Development of digital skills and competencies related to automation and data analytics;
- Collaboration with universities and dual education programs;
- Support for employees in obtaining higher-level qualifications (master's, doctoral, MBA, DBA programs);

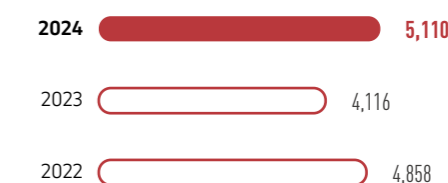
¹⁶ The indicators for 2023–2022 have been recalculated due to changes in methodology. The average number of training hours per employee = the total number of training hours completed by employees / the headcount at the end of the period.

- Development of outplacement programs to provide new employment opportunities for staff in the case of organizational restructuring or retirement by acquiring additional qualifications;
- Implementation of internal educational platforms, including digital training catalogs and mentorship programs.

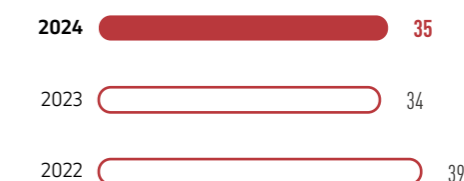
The company systematically invests in personnel development. In 2024, KMG allocated KZT 5,109.7 million for employee training, which exceeds the 2023 figure (KZT 4,115.7 million) by 19%.

The average number of training hours per employee amounted to 35 hours in 2024, which is 2.9% higher than in 2023 (34 hours). On average, male employees received 38 hours of training, while female employees received 25 hours—this difference is attributed to the structure of the production workforce¹⁶.

INVESTMENTS IN TRAINING, MILLION TENGE



AVERAGE NUMBER OF TRAINING HOURS PER EMPLOYEE



KEY TRAINING AND PROFESSIONAL DEVELOPMENT PROGRAM TOPICS



SAFETY AND RISK MANAGEMENT TRAINING

- To prevent road traffic accidents, KMG conducted defensive driving training in accordance with the international ROSPA standard. A total of 3,404 drivers responsible for transporting personnel and hazardous materials completed the training (compared to 691 people in 2023 and 350 people in 2022). The program will continue in the coming years.

- Training on "Internal Auditor of Integrated Management System" (ISO/OHSAS) was held with 255 employees participating.
- 422 employees completed training in risk assessment skills.

INTERNATIONAL QUALIFICATIONS AND CERTIFICATIONS

- 63 employees were trained to obtain international qualifications and certifications under programs such as DiplFR, ACCA, IPMA, CIMA, PMP, CFA, CIA, and others.
- As part of the annual certification of key personnel at KMG and its subsidiaries in line with the IPMA international project management standard, 83 specialists passed certification and exams.
- Over 500 employees of KMG and its subsidiaries participated in internal project management training.

MODULAR TRAINING PROGRAMS

- With the support of Samruk-Kazyna JSC, modular programs were implemented in the following areas: IR School, HR School,

CnB School, and Chief Geologist. A total of 48 employees took part in the training.

- In cooperation with Eni SpA Affiliate Agip Caspian Sea B.V., an offline "Total Project Management" training was held, delivered by ENI Corporate Training Center professor Manuel Martinatti. The program was attended by 43 employees.

INDUSTRY-SPECIFIC EDUCATIONAL PROGRAMS

Two specialized educational programs were successfully completed:

- FROSIO Certified Coating Inspectors – 7 employees were trained in accordance with FROSIO requirements and ISO/IEC 17024.
- Well Control under the IWCF international standard – 7 employees trained.

These international certificates confirm a high level of professional knowledge and the ability to ensure safety in drilling and corrosion protection.

YOUTH EDUCATIONAL INITIATIVES

As part of the “ALYP” program, a new phase of training was conducted for young transformation leaders, including:

- Module 1: DMAIC project implementation methodology;
- Module 2: Basics of effective interaction and personal efficiency;
- Module 3: Financial and technological literacy.

In 2024, 63 specialists completed the training. Upon completion, participants implement individual projects and can become mentors for new program groups.

Under the youth program “Zheti Qadam”, nine employees completed training focused on developing managerial competencies, communication skills, and understanding the principles of budget planning.

EMPLOYEE PERFORMANCE EVALUATION

KMG aims to enhance labor efficiency through a performance evaluation system that also facilitates employee potential development and career advancement. The core principles of the performance evaluation system include:

- Cascading corporate business goals into individual KPIs.
- A transparent and objective system for evaluating employee results.
- Feedback and adjustments to individual development plans.
- Regular assessments and consistent methodology.

TRAINING IN SUSTAINABLE DEVELOPMENT

As part of KMG’s strategic goal “Sustainable development and reduction of carbon intensity,” the following trainings were held:

- Carbon Capture, Utilization and Storage (CCUS) (INPEX Corporation).
- Training of greenhouse gas verification experts.
- Greenhouse gas management at enterprises.
- ESG strategic seminar.
- Waste management.
- Biodiversity impact management.
- GHG emission regulation and ESG integration.
- Low-carbon development and carbon footprint training.
- Green Ports and EcoPorts certification.
- Petro Decarbonization Program.
- Carbon capture, utilization, and storage.
- Diversity and inclusion.

SUCCESSION SYSTEM AND TALENT MANAGEMENT

KMG is developing the internal talent pool and succession system for key positions. This approach includes:

- Selection of high-potential employees and preparation for leadership positions.
- Development of career paths and individual development programs.
- Transfer of knowledge from foreign specialists to local employees.
- Development of cross-functional expertise and internal mentoring.

To support and accompany the professional development of young specialists, newly hired employees, talent pool members, and KMG Group staff, KMG has introduced an institute of Internal Trainers and Mentors.

Talent pool formation and development across the KMG Group is conducted through the “MANSAP” project. In 2023–2024, a mentorship program was launched under which successors from Pools A and B act as mentors for Pool C participants.

At the end of 2024, selection was carried out for the industrial talent pool in the following areas: Oil Refining and Petrochemicals, Exploration and Production, Transportation and Marketing, and Oilfield Services. More than 1,000 employees participated in the selection.

In 2024, 35% of key position appointments were made from the talent pool.

YOUNG PROFESSIONALS ENGAGEMENT

KMG actively collaborates with educational institutions in the regions where its production facilities are located by implementing programs for training young professionals:

- Education funding for students – in 2024, 1,966 students had their university education financed by various KMG enterprises.
- Internship programs – in 2024, 1,713 students completed industrial or pre-graduation internships.

Key youth development programs include:

- “Zhas Maman” – a program for young professionals at Atyrau Refinery. In 2024, 9 people participated; 4 completed training, 2 were employed, and 5 continued their studies.
- Dual Training – a combination of education, internship, and employment:
 - EMG – 106 participants, 10 employed;
 - KBM – 57 participants;
 - Atyrau Refinery – 30 participants, 7 employed;
 - Pavlodar Refinery – 86 participants, 22 employed;
 - KPI – 10 participants;
 - PKOP – 27 participants;
 - KMG International – 42 participants.

- “KMGE School” – a program for training niche specialists for KMG Engineering LLP. In 2022–2024, 18 people were trained, of which 18 were employed, and 3 people continue their education.
- “Intern” – a vocational training program at Atyrau Refinery. Between 2023–2024, 60 participants were trained, 31 of whom were hired. An additional 20 interns were selected in 2024.

In 2024, KMG, together with Mangistaumunaigas JSC, implemented a unique project to train 60 unemployed residents of the Mangystau region. The goal was to reduce unemployment and ensure socio-economic stability in the region.

The “Educational Intensive” program was specially designed to prepare participants for employment. During the program, future specialists acquired key professional skills, gained knowledge of the oil and gas industry, and adapted to work processes.

Upon completion, all graduates were offered employment at Mangistaumunaigas JSC. For many, this became their first job, providing practical experience and launching their careers in the oil and gas sector.

PERCENTAGE OF EMPLOYEES WHO RECEIVED REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS, %



REMUNERATION AND MOTIVATION MANAGEMENT

GRI 401-2, GRI 202-1, GRI 405-2, GRI 201-3

KMG adheres to the principles of fairness, transparency, and objectivity in remuneration management.

KEY COMPONENTS OF KMG'S REMUNERATION SYSTEM:

Remuneration

- A grading system ensures internal fairness and market competitiveness.
- Differentiated pay based on job complexity, qualifications, level of responsibility, and employee performance.
- A performance-based bonus system linked to key performance indicators (KPIs), including incentive programs to motivate employees.
- Labor market monitoring and salary benchmarking to maintain competitiveness.
- Transparency of the remuneration system, enabling employees to understand how their salaries are determined and what factors affect changes.

Social Benefits and Support Programs

- Voluntary medical insurance – for employees and their family members.
- Non-state pension provision – to ensure additional financial stability for employees.
- Partial reimbursement for wellness and fitness activities – to promote employee health.
- Well-being programs – to ensure comfortable working conditions and improve workplace infrastructure.
- Financial support for employees in difficult life situations – such as childbirth, serious illness, or the loss of loved ones.

Non-Material Incentive Programs

- Professional excellence competitions – to reward top performers.
- Public recognition and awards – for outstanding contributions.
- Encouragement of creative initiatives and participation in Kaizen programs (process improvement).
- Promotion of a feedback and engagement culture – to strengthen internal communication.

KMG applies a grading-based remuneration system, ensuring equal pay for equal work regardless of social category. In 2024, the average ratio of women's to men's average remuneration across the Company was 97%. By personnel category, the ratio stood at 72% among administrative and managerial personnel (AMP) and 92% among production personnel (PP). The difference in average pay within AMP is due to the variation in positions held within this group.

The ratio of entry-level salaries to the national minimum wage in 2024 was 6.18 for men and 7.24 for women.

KMG strives not only for a fair and effective compensation system but also to foster an environment where every employee feels valued and motivated to build a long-term career within the Company.

Employee Pension Plans

In accordance with national legislation, pension savings of citizens of the Republic of Kazakhstan are held in the Unified Accumulative Pension Fund as well as in voluntary pension funds.

KMG also fulfills additional social support obligations for retired employees through collective bargaining agreements. Employees retiring upon reaching the statutory retirement age, as well as those already retired, are provided with:

- Financial assistance for national and state holidays of the Republic of Kazakhstan;

- One-time payments upon reaching milestone ages;
- Sanatorium treatment vouchers with partial cost compensation;
- Other forms of social support.

Additionally, KMG enterprises implement a pre-retirement employee support program, offering the option of early retirement with compensation upon mutual agreement. Employees reaching retirement age also receive compensation when concluding employment.

Indicator	2022	2023	2024
Social contributions and mandatory pension deductions, in billion KZT	66	79	101

For 2024, the amount includes the Mandatory Pension Contributions by the Employer (MPC), introduced in 2024.

SOCIAL POLICY

KMG strives to ensure favorable working conditions and a high level of social protection for its employees. The main areas of the Company's social policy include:

- Support for projects focused on continuous production improvement.
- Implementation of collective agreements and social programs.
- Support for inclusivity and equal opportunities.
- Improvement of working and living conditions for employees at production sites.
- Development of corporate social responsibility through support for vulnerable population groups.
- Organization of corporate volunteering programs.
- Development of internal communications.
- Conducting social stability research and developing improvement plans based on the results.

reached 79%, which is 4 percentage points higher than in 2023 (75%).

To assess social stability, the annual Samruk Research Services study is conducted. Its results are used to develop individual action plans at the enterprise level. These plans aim to address identified problem areas and improve employee satisfaction. Measures include improving working conditions, enhancing feedback systems, organizing comfortable living and dining arrangements, among others.

In 2024, the Corporate Center introduced a unified action plan template across all subsidiaries to improve SRS performance and initiated on-site consultations to assist with plan development, thereby strengthening the Company's social policy.

SOCIAL STABILITY LEVEL

In 2024, the level of social stability in KMG's labor collectives was assessed as satisfactory – the index

EMPLOYEE LIVING AND WORKING CONDITIONS

KMG systematically works to improve the working and rest conditions of its employees. These issues are included in the social stability improvement plans of subsidiaries and reflected in roadmaps for 2023–2027 developed by all Group companies.

In 2024, improvement projects were planned at 183 facilities of social infrastructure. Of these:

- Work was completed at 106 sites,

- 20 new facilities were built,
- Major repairs were carried out at 23 facilities,
- Current repairs were completed at 51 facilities,
- Train cars, utility cabins, and other infrastructure were upgraded – 12 units in total.

Total investment in 2024 amounted to KZT 3.7 billion. Completion of the remaining 77 facilities, worth KZT 3.1 billion, is scheduled for 2025.

TRADE UNIONS AND COLLECTIVE AGREEMENTS

GRI 2-30, GRI 401-2

There are 35 trade union organizations operating within the KMG Group, representing 36,606 employees.

COOPERATION WITH TRADE UNIONS

KMG builds relationships with trade unions within the framework of social partnership, guided by labor legislation at the industry and regional levels.

At the industry level, key cooperation parameters – including social guarantees, labor organization and remuneration, employment, gender and youth policies, labor protection, and mechanisms for preventing and resolving labor disputes – are defined in the Sectoral Agreement for the oil, gas, refining, and petrochemical industries of Kazakhstan. KMG and its companies actively participated in the development of this document.

KMG and its subsidiaries are members of the Industry Commission on Social Partnership, where issues of social stability, sectoral qualification standards, and human capital

development are addressed. KMG complies with the provisions of the Sectoral Agreement for 2023–2025, aimed at strengthening employee social protection, enhancing the role of trade unions, and ensuring safe working conditions.

The wage system in KMG's subsidiaries complies with industry standards, including minimum inter-grade ratios and the minimum wage rate for grade 1 workers.

At the regional level, cooperation is carried out through local social partnership commissions, where employment and occupational safety issues, including labor disputes, are considered. Conciliation commissions operate in all KMG companies.

To maintain social stability, KMG and subsidiary leadership engage in regular dialogue with trade unions. Meetings with trade union committees help promptly resolve issues related to collective agreement implementation, labor discipline, working conditions, and social benefits and compensations.

COLLECTIVE AGREEMENTS AND SOCIAL SUPPORT

KMG ensures equal opportunities for all employees to exercise their labor rights and actively engages with labor collectives in the negotiation and amendment of collective agreements. Within the framework of social partnership, the Company strictly adheres to established negotiation deadlines, guarantees transparency of the process, and fulfills all obligations stipulated in the collective agreements.

Collective agreements are in effect in 21 subsidiaries of the KMG Group, covering 97% of the Group's total workforce.

According to labor legislation, every employee has the right to participate in collective bargaining through their representatives and to review the signed collective agreement. There are no restrictions on the right to freedom of association or collective bargaining based on type of activity or geographic location in the Company's operations. We foster an enabling environment for employees to fully exercise their right to freedom of association.

Due to the expiration of terms in 2024, new editions of collective agreements were signed at Ozenmunaigas JSC, EP KMG Catering LLP, KazGPZ LLP, and Ozenmunaiservice LLP. At the initiative of labor collectives, new collective agreements were also signed at the branch of KMG Kashagan B.V. CJSC in the Republic of Kazakhstan and at the Corporate Center of NC KazMunayGas JSC.

Additional agreements were signed at Ozenmunaiservice LLP, Oil Transport Corporation LLP, and Water Production and Transportation Management LLP, which enhanced the existing social benefit packages.

Amendments and additions were made to internal regulatory documents and the types and conditions of social benefits were revised upward at the following companies:

KMG GREEN Energy LLP, KMG Engineering LLP, Pavlodar Petrochemical Plant LLP, MangistauEnergoMunay LLP, MunaiTelecom LLP, Oil Services Company LLP, KMG PetroChem LLP, Kazmortransflot LLP, and KMG Security LLP.

KMG is consistently developing its system of social support for employees and their families. Collective agreements across the Group provide for more than fifty types of social benefits.

In the subsidiaries located in the Mangystau, Atyrau, Aktobe, Kyzylorda, and Pavlodar regions, employees are entitled to the following benefits:

- financial assistance for health improvement,
- voluntary medical insurance for employees and their families,
- compensation of costs for sanatorium and health resort treatment,
- payments in case of disability or occupational disease,
- financial assistance in difficult life situations,
- maternity and childcare benefits,
- payments upon early retirement, among other types of assistance.

In 2024, KMG continued its efforts to standardize collective agreements to ensure a unified system of voluntary social benefits and transparent principles for their distribution.

All established social payments and guarantees were maintained and paid in full in 2024. The total amount of social support provided during the year amounted to KZT 25 billion.

INTERNAL COMMUNICATIONS

KMG Group has established an internal communications system that ensures effective feedback between management and employees. All enterprises within KMG hold regular meetings between management and employee teams to discuss social, workplace, and operational matters. The goal of this system is twofold: to inform employees about the Company's strategic goals and current developments, and to take into account the opinions of employees and their representatives.

In 2024, a total of 67 reporting meetings were held with the participation of over 9,000 employees

OMBUDSPERSON

The Ombudsperson of NC KazMunayGas JSC is an independent official accountable to the Board of Directors of KMG. The main role of the Ombudsperson is to ensure compliance with the principles of corporate ethics, assist in resolving labor disputes, and prevent violations of employees' rights.

The Ombudsperson operates based on the principles of independence, neutrality, impartiality, confidentiality, and informality.

In 2024, the Ombudsperson's Office actively worked to raise employee awareness on issues of corporate ethics and employee rights. As part of this effort, information sessions were held at 14 major KMG enterprises, including PetroKazakhstan Oil Products LLP, Karazhanbasmunay JSC, Mangistaumunaigas JSC, Pavlodar Petrochemical Plant LLP, Ozenmunaigas JSC, and others. The Ombudsperson visited both industrial sites and social infrastructure, such as dormitories and canteens, to speak with employees about working conditions and compliance with the Code of Business Ethics.

from KMG subsidiaries. During these meetings, employees raised more than 300 questions on topics such as production processes, employment, occupational safety, and social support. Each issue received a formal response and appropriate actions were taken.

To support open communication, additional tools have been introduced at subsidiaries, including employee receptions with senior executives, corporate blogs, internal information portals, and video displays for announcements. Information is also promptly disseminated through noticeboards and electronic messages.

Employees of the KMG Group can contact the Ombudsperson via the Nysana hotline, email, or in person.

Additionally, in 2024, the KMG Ombudsperson:

- Participated in updating the Code of Business Ethics in line with the Company's new corporate values.
- Provided methodological support to the Ombudspersons of Embamunaigas JSC and KazTransOil JSC.
- Took part in forums, conferences, and councils of Ombudspersons organized by Samruk-Kazyna JSC and established cooperation with the National Human Rights Center.

The Ombudsperson's Office will continue to evolve with a focus on prompt response to appeals and strengthening corporate ethics across KMG.

ETHICAL PRINCIPLES

NC KazMunayGas JSC operates in accordance with its Code of Business Ethics (hereinafter – the Code), which was updated at the beginning of 2025. The provisions of the Code are mandatory for all employees, including top management. The Code also extends to subsidiaries and dependent entities, as well as business partners and contractors.

The Code sets out the fundamental principles of ethical conduct that form the foundation of the Company's corporate culture:

- Ethical conduct – adherence to high moral standards, respect for traditions, cultural differences, and applicable laws.
- Professionalism – continuous development of competencies, responsible job performance, and striving for excellence.
- Fairness and meritocracy – equal opportunities for all employees, transparent recruitment and promotion procedures.
- Respect – appropriate interaction with colleagues, partners, shareholders, government agencies, and other stakeholders.
- Openness – honesty and transparency in business processes, open information sharing, and constructive dialogue.

- Environmental responsibility – compliance with environmental standards and rational use of resources.
- Occupational health and safety – ensuring safe working conditions and minimizing the risk of accidents.
- Sustainable development principles – taking into account the long-term interests of the Company, society, and future generations.
- Prohibition of discrimination and harassment – zero tolerance for coercion, intimidation, or unethical behavior.

Compliance with the Code is monitored by the Company's Compliance Service and Ombudsperson's Office. All employees are required to read the Code and confirm their agreement with its provisions. Violations of the Code may result in disciplinary action in accordance with internal policies and the laws of the Republic of Kazakhstan.

The Company ensures the availability of confidential and accessible mechanisms for reporting potential violations of the Code and guarantees protection from retaliation for good faith reporting, fostering an open and ethical corporate environment.

MECHANISMS FOR SUBMITTING APPEALS AND COMPLAINTS

GRI 2-25, GRI 2-26

KazMunayGas places great importance on ensuring accessible, transparent, and effective mechanisms for submitting appeals and complaints. Several dedicated channels are provided, allowing

stakeholders to report violations, request consultations, and track the progress of their submissions.

MAIN CHANNELS FOR APPEALS

ANTI-CORRUPTION AND FRAUD HOTLINE

The KMG Compliance Hotline is administered independently by KPMG, ensuring objectivity and protection for whistleblowers.

How to report:

- Hotline number: 8 (800) 080-47-47
- WhatsApp: 8 (771) 191-88-16
- Email: mail@sk-hotline.kz
- Web portal: www.sk-hotline.kz

The channel can be used to report:

- Suspected corruption, fraud, or abuse
- Conflicts of interest involving KMG employees or partners
- Violations of the Code of Ethics or anti-corruption policy
- Suspected violations of laws

The Company guarantees complete confidentiality and protection from harassment for applicants. Appeals are reviewed in strict accordance with international standards of business ethics.

The process of registering incoming requests and providing responses to the applicant is fully automated. All requests from the hotline operator are submitted to the compliance officers of the KMG Group of Companies in real time.

On a quarterly basis, the Compliance Service provides information on the results of consideration of received appeals to the Audit Committee and the Board of Directors of KMG.

NYSANA UNIFIED SOCIAL AND LABOR HOTLINE

NYSANA is a centralized channel for addressing social and labor-related issues, available to both employees and external stakeholders.

How to report:

- Hotline number: 8 (800) 080-30-30
- WhatsApp: 8 (778) 120-99-11
- Email: nysana@csc.kz
- Web portal: nysana.csc.kz
- Internal corporate portal access

What can be reported:

- Facts of violations in the field workplace safety and occupational health
- Labor disputes
- Any other issues related to employment and labor relations

Reports can be submitted anonymously. All submissions are handled confidentially and reviewed in a timely manner.

E-OTINISH UNIFIED INFORMATION SYSTEM

The E-Otinish platform is a unified digital system in Kazakhstan designed to process appeals from individuals and legal entities. This channel ensures transparent and effective consideration of applications in accordance with the legislation of the Republic of Kazakhstan.

How to report:

Appeals and complaints could be submitted through:

- Website: <https://eotinish.gov.kz>
- Mobile App: "E-Otinish" (available on App Store and Google Play)
- Public Service Centers across Kazakhstan

Benefits of the system:

- Automatic registration of appeals with assignment of a unique number
- The ability to track the status of consideration of the appeal
- Guarantee of providing an official response within the established time frame

APPEALS STATISTICS

COMPLIANCE AND ETHICS HOTLINE

In 2024, the Compliance and Ethics Hotline received 115 reports, representing a 35% increase compared to the same period in 2023. This growth indicates increasing engagement from employees and contractors, greater trust in the function, and successful promotion of the hotline and the compliance culture within KMG. The most frequent topics of appeals included corruption, labor disputes, and procurement.

meetings with the Ombudsperson. Upon review, the Ombudsperson provided feedback to applicants. This work required careful consideration, thorough analysis, and timely responses to the involved employees.

Among the reviewed cases:

- Complaints regarding managerial pressure were resolved, including disciplinary measures taken.
- Labor disputes were settled through explanatory meetings and consultations.

NYSANA UNIFIED SOCIAL AND LABOR HOTLINE

During the reporting period, 112 appeals related to labor rights violations and social-labor conflicts were received through the NYSANA communication channel, email, and in-person

E-OTINISH UNIFIED INFORMATION SYSTEM

In 2024, 1,289 appeals from individuals and legal entities were submitted to KMG via the E-Otinish platform.

APPEALS HANDLING PROCEDURE

All appeals received by KMG are processed in accordance with the Appeals Handling Regulation, approved by the Board of Directors in 2024. The Regulation outlines:

- Registration of appeals, including through the "E-Compliance" system.
- Classification by the nature of violation (corruption, ethics, labor relations, etc.).
- Appointment of responsible parties and creation of working groups, when necessary.
- Review timelines.
- Processing principles: objectivity, completeness, confidentiality, and whistleblower protection.
- Feedback mechanisms: applicants are informed about the status and outcomes of their complaints.

HUMAN RIGHTS PROTECTION

GRI 2-23, GRI 2-24, GRI 406-1

KMG'S HUMAN RIGHTS COMMITMENTS

NC KazMunayGas JSC recognizes the importance of respecting and protecting human rights, guided by both international standards and national legislation. The Company is committed to respecting human rights across its entire value chain and expects the same from its partners, suppliers, and contractors.

KMG bases its activities on the following international standards and declarations:

- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- UN Guiding Principles on Business and Human Rights;
- ILO Declaration on Fundamental Principles and Rights at Work;
- UN Declaration on the Rights of Indigenous Peoples;

- UN Voluntary Principles on Security and Human Rights;
- UN Global Compact.

The Company recognizes freedom of association, the right to safe working conditions, and strictly prohibits discrimination and exploitative practices. It also respects the cultural identities of local communities in its regions of operation.

No child or forced labor is used, and equal rights are guaranteed regardless of race, religion, or gender.

No cases of discrimination were recorded during the reporting period.

KMG ensures the availability of accessible channels for reporting potential violations, including anonymous mechanisms.

DIVERSITY AND INCLUSION

KMG adheres to principles of equal opportunity, inclusivity, and a discrimination-free work environment. The Company believes that a diverse workforce and inclusive corporate culture enhance operational efficiency and sustainable development.

GENDER EQUALITY

- KMG promotes equal opportunities for women and men at all management levels and actively involves women in all aspects of business operations.
- Ensures equal pay for equal work.

- Implements initiatives to increase the proportion of women in managerial positions, in particular by increasing the proportion of women in succession pools.
- Taking into account the specifics of work in the oil and gas industry, KMG applies measures to minimize health risks for women in production environments.



SUPPORT FOR LOCAL TALENT AND VULNERABLE GROUPS

- KMG prioritizes the hiring of local personnel in operational regions and supports their professional development.
- Promotes employment of migrants and Kandasses (ethnic Kazakhs returning to their homeland).

INCLUSION OF PEOPLE WITH DISABILITIES

- KMG strives to create a comfortable and accessible work environment for people with disabilities.

- Workplaces are adapted, and assistive technologies are introduced to improve mobility and working conditions.

CREATION OF AN INCLUSIVE CORPORATE CULTURE

- KMG fosters a workplace environment where every employee feels accepted and respected.
- KMG develops internal training programs aimed at fostering a culture of respect for diversity and preventing discrimination.

KMG acknowledges that diversity and inclusion are not only a matter of social responsibility but also a competitive advantage, driving innovation and performance.

OCCUPATIONAL SAFETY AND WORKERS' RIGHTS PROTECTION

KMG ensures safe and healthy working conditions for all employees, which is an integral part of its commitment to human rights. The Company has implemented:

- Occupational safety policies in line with international standards.

- Regular safety training programs.
- Monitoring systems to ensure compliance with safety regulations and mitigate workplace risks.

KMG respects the right of employees to freedom of association and collective bargaining, in accordance with the laws of the Republic of Kazakhstan.

PROHIBITION OF FORCED AND CHILD LABOR

KMG strictly adheres to a zero-tolerance policy regarding forced and child labor. The Company:

- Eliminates all forms of work performed under threat of punishment or against the will of the worker, in line with ILO Convention No. 29 on Forced Labor.
- Monitors compliance with labor standards both within the Company and among its suppliers and contractors.

- Ensures that all employees work under voluntarily signed employment contracts and have the right to terminate their employment in accordance with applicable legislation.

CONSIDERATION OF APPEALS AND HUMAN RIGHTS MONITORING

KMG has implemented a multi-level appeals and complaints submission mechanism, which includes:

- Hotlines and anonymous reporting channels.

- An Ombudsperson and Compliance Service that provide impartial review of complaints.

IMPLEMENTATION OF THE HUMAN RIGHTS POLICY

To ensure the effective implementation of its Human Rights Policy, KMG undertakes the following actions:

- Monitors the effectiveness of human rights measures and implements corrective actions when violations are identified.

TRAINING AND AWARENESS

- Regularly trains employees on human rights issues, including diversity and inclusion principles.
- Conducts awareness initiatives for employees, suppliers, and contractors.

ENGAGEMENT WITH STAKEHOLDERS

- Actively engages with government agencies, NGOs, and international organizations on human rights protection issues.
- Conducts public hearings and consultations with local communities when implementing projects.

RISK ASSESSMENT AND MANAGEMENT

KMG periodically analyzes risks related to potential human rights violations and develops response programs and applies human rights due diligence principles.

KMG views the implementation of its Human Rights Policy as a dynamic process, requiring continuous improvement aligned with international best practices.

TRANSPARENCY AND ACCOUNTABILITY

- Discloses information on the implementation of the Human Rights Policy in its non-financial reports, in accordance with international standards.

OUR COMMUNITIES

GRI 203-1, GRI 413-1

As part of subsoil use contracts and enterprise development master plans, KMG allocates substantial funds for infrastructure development and social assistance for those in need. Based on

agreements and memoranda with local authorities (akimats), KMG subsidiaries (SDEs) finance regional social initiatives.

KEY REGIONAL INVESTMENTS

- Ozenmunaigas JSC – KZT 1.7 billion for the development of social infrastructure in Zhanaozen and Karakiyan district of the Mangystau Region.
- Embamunaigas JSC – KZT 617.7 million for the construction of a 150-seat sports and wellness center in Tandai village (Atyrau Region) and KZT 168.8 million for multifunctional sports grounds.
- Mangistaumunaigas JSC – KZT 140 million to the Mangystau akimat for regional infrastructure development.
- Kazakhoil Aktobe LLP– KZT 168 million for regional development in Aktobe Region and KZT 205.3 million to its social fund.
- KazakhTurkMunai LLP – KZT 285.7 million for social infrastructure in Aktobe and Mangystau Regions.
- Urikhtau Operating LLP – KZT 34.4 million for regional socio-economic development.
- Kazgermunai LLP – KZT 375.58 million for the socio-economic development of the Kyzylorda region.

COMPLETED PROJECTS

CONSTRUCTION OF THE MULTIFUNCTIONAL SPORTS COMPLEX "JAIYQ ARENA" IN URALSK

As instructed by the President of Kazakhstan, KMG completed the construction of a multifunctional sports complex in Uralsk. The facility spans over 20,000 sq.m., has a capacity of 300 people per shift, and includes a swimming pool, halls for martial arts, fitness, futsal, volleyball, basketball, and a 1,200-seat athletics arena. Total cost: KZT 19.9 billion.

REHABILITATION AND SUPPORT CENTER FOR CHILDREN WITH SPECIAL NEEDS IN ATYRAU REGION

The modern facility was handed over to the Zhylyoi district akimat. It employs 40 specialists (speech therapists, defectologists, psychologists), providing free services to children aged 3–14. Up to 180 children attend the center daily.

PALACE OF SCHOOLCHILDREN IN KYZYLORDA

Funded by JV Kazgermunai LLP (KZT 2.4 billion), the modern educational complex accommodates 350 children and includes a technocenter, programming and robotics classes, environmental lab, TV studio, and creative classrooms.

PROJECTS IN PROGRESS

DEVELOPMENT OF RURAL ANCHOR SCHOOLS IN MANGYSTAU REGION

As part of the national "Otpan" initiative, KMG is modernizing rural schools in Mangystau. In 2024, over 50 classrooms were upgraded in the villages of Taushyk, Zhetybai, and Rakhat. STEM labs, art and TV studios, and robotics classrooms have been established in three schools serving more than 3,500 students and staffed by 380 teachers.

"ZHARKYN BOLASHAK" GRANT PROGRAM

To improve the level of education in Mangystau Region, KMG is implementing a grant support program. In 2024, 1,010 grantees studied at 62 institutions across 10 regions. 2.4 billion tenge has been allocated to finance the program.

CHARITY INITIATIVES

- Karazhanbasmunai LLP contributed KZT 32 million to build a children's playground commemorating the 50th anniversary of the first oil well at the Karazhanbas field.
- PetroKazakhstan Oil Products LLP donated KZT 180 million to the Shymkent Corporate Social Development Fund "Shymkent – Kayiryndy Kala" for local social projects.
- KMG allocated up to KZT 10 billion to assist flood-affected regions through the Samruk Kazyna Trust Corporate Foundation, the unified operator of charitable assistance for the Samruk-Kazyna Fund.



[HTTPS://WWW.KMG.KZ/EN/](https://www.kmg.kz/en/)

SUPPLIER ENGAGEMENT

GRI 204-1

EXPANDING COMPETITIVE PROCUREMENT

In 2024, the total procurement plan of the KMG Group amounted to KZT 1,219 billion (excluding VAT). KMG's procurement priorities include reducing single-source purchases and increasing the share of competitive tenders, thereby promoting fair competition and sustainable development goals.

Competitive procurement methods include open tenders, price quotation requests, e-store

purchases, and commodity exchanges. In 2024, the volume of contracts from competitive procurement reached KZT 593 billion, accounting for 51% of the total procurement plan.

Single-source purchases are applied only when competitive procedures are objectively not feasible. This approach minimizes the risks of limited competition and enhances procurement transparency.

VOLUME OF COMPETITIVE PROCUREMENT (EXCLUDING VAT), KZT BILLION¹⁷

Year	Goods		Works and Services		Total	
	Amount	Share, %	Amount	Share, %	Amount	Share, %
2022	237	23	275	26	512	49
2023	302	25	320	26	622	51
2024	258	22	335	29	593	51

IMPORT SUBSTITUTION

KMG actively promotes import substitution in procurement, guided by the requirements of the Law of the Republic of Kazakhstan "On Procurement of Certain Entities of the Quasi-Public Sector" dated June 8, 2021. A Program to Support the Establishment of New Production Facilities is being implemented, which provides for the conclusion of offtake contracts.

The main goal of the Program is to support private entrepreneurs launching new production facilities and implementing technological upgrades to

manufacture products in demand by companies within the Samruk-Kazyna Fund. Offtake contracts enable companies to receive guaranteed orders for products that will be manufactured within the territory of the Republic of Kazakhstan.

In 2024, KMG's subsidiaries and dependent entities signed 137 offtake contracts totaling KZT 58.7 billion (including VAT), contributing to the development of domestic production and reduction of import dependency.

¹⁷ Competitive procurement methods include tendering, request for quotations, electronic marketplace, and commodity exchanges.

VOLUME OF KMG OFFTAKE CONTRACTS

Year	Number of Contracts	Amount, million KZT
2022	56	791
2023	64	1,687
2024	137	58,688

IMPORTED GOODS IN PROCUREMENT

Year	Amount, billion KZT	Share of Goods Supplied Without Certificate of Kazakh Origin (CT-KZ) ¹⁸ , %
2022	90	23
2023	158	28
2024	112	22

TOTAL VOLUME OF SUPPLIED GOODS, WORKS AND SERVICES (GWS), INCLUDING LONG-TERM PROCUREMENT CONTRACTS, AND SHARE OF LOCAL CONTENT IN GWS PROCUREMENT

Year	Goods		Works and Services		Total	
	Total amount, billion KZT	Local Content Share, %	Total amount, billion KZT	Local Content Share, %	Total amount, billion KZT	Local Content Share, %
2022	410	58	1,290	90	1,700	82
2023	606	50	1,580	88	2,186	77
2024	503	55	1,550	89	2,053	81

¹⁸ The share of goods supplied without a certificate of Kazakhstani origin represents the share of imported goods delivered during the reporting period.

SUSTAINABLE DEVELOPMENT PRINCIPLES IN ENGAGEMENT WITH COUNTERPARTIES

KMG builds relationships with counterparties based on the principles of sustainable development, which include legality and transparency of business processes, compliance with contractual obligations, and zero tolerance for corruption. When selecting suppliers, KMG evaluates a combination of key factors: optimal price-quality ratio, delivery terms, and the business reputation of the counterparty.

In turn, KMG places reciprocal obligations on its partners, requiring them to:

- Comply with applicable legislation
- Ensure fair treatment of employees
- Prohibit the use of child labor
- Provide safe working conditions
- Adhere to environmental standards
- Uphold ethical business practices

These requirements form an integral part of contracts concluded by KMG with counterparties. Their inclusion helps protect labor rights, ensure decent working conditions for citizens of the Republic of Kazakhstan, and strengthen environmental safety.

KMG is confident that the implementation of these measures will help reduce cases of misconduct among partner companies and increase the level of responsibility of participants in procurement processes.

