

Approved by
the resolution of the
Management Board
of NC KazMunayGas JSC
dated April 25, 2025, Minutes
No.7/2025

Endorsed by
the resolution of the
Management Board
of NC KazMunayGas JSC
dated February 19, 2025, Minutes
No. 7

Human Rights policy of the NC KazMunayGas JSC

1. Purpose of the document and general provisions

1.1. This Human Rights Policy of the NC KazMunayGas JSC (hereinafter referred to as the Policy) has been developed in accordance with the legislative acts of the Republic of Kazakhstan and international human rights standards, as well as internal regulatory documents of the NC KazMunayGas JSC (hereinafter referred to as KMG).

1.2. KMG recognizes the importance of respecting and upholding the fundamental human rights proclaimed by the United Nations, including labor rights, the right to gender equality, the right to a favorable environment, the rights of indigenous peoples and special groups, and others.

1.3. KMG ensures the observance of human rights set forth in the Constitution of the Republic of Kazakhstan and in the current labor legislation of the Republic of Kazakhstan.

1.4. KMG recognizes the principles set forth in the following international standards and documents:

- The Universal Declaration of Human Rights;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights;
- The Guiding Principles of Entrepreneurship from the perspective of Human Rights of the United Nations;
- Declarations of the International Labour Organization on Fundamental Principles and Rights at Work;
- United Nations Declaration on the Rights of Indigenous Peoples;
- The United Nations Voluntary Principles on Security and Human Rights;
- The UN Global Compact.

1.5. If there are discrepancies between the provisions of this Policy and the provisions of the legislation of the Republic of Kazakhstan, KMG will strive to respect internationally recognized human rights without violating the legislation of the Republic of Kazakhstan.

1.6. KMG has zero tolerance for human rights violations throughout the entire value chain. KMG expects suppliers, contractors and partners, the stakeholders with whom it interacts, to be equally strict in compliance with the law and respect for internationally recognized human rights.

1.7. This Policy should be considered in conjunction with the Code of Business Ethics of NC KazMunayGas JSC, the Anti-Corruption Policy of NC KazMunayGas JSC and its subsidiaries and affiliated companies, the Corporate Social Responsibility Code of NC KazMunayGas JSC, the Guidelines for the Management System in the field of Sustainable development in the group of companies of NC KazMunayGas JSC and other relevant documents of KMG.

2. Scope of application

2.1. This Policy applies to all structural divisions of KMG and is mandatory for all interested parties.

2.2 Based on this Policy, KMG's subsidiaries, affiliated companies, jointly controlled entities and joint ventures are recommended to develop and approve a similar internal document in accordance with the established procedure.

3. Definitions and abbreviations

Discrimination	Any distinction, exclusion or preference based on race, skin color, sex, religion, political beliefs, nationality or social origin and resulting in the elimination or violation of equality of opportunity or treatment in the field of work and occupation (article 1, paragraph 1, of the International Labour Organization Convention No. 111 on Discrimination in Employment Work and occupation (Geneva, June 25, 1958))
Stakeholders	individuals, legal entities, groups of individuals or legal entities that influence or may be influenced by the activities of KMG, its products or services and related actions, by virtue of the legislation of the Republic of Kazakhstan, concluded agreements (contracts, agreements) or indirectly (indirectly). This definition does not apply to all those who may be familiar with KMG or express an opinion about it. The main representatives of stakeholders are shareholders, employees, customers, suppliers, government agencies, subsidiaries and affiliated organizations, bondholders, creditors, investors, public organizations, the population of the regions in which KMG operates and its subsidiaries and dependent organizations
SUBs	subsidiaries and affiliated companies, including jointly controlled entities and joint ventures of KMG
KMG	of NC KazMunayGas JSC

Inclusivity	creating conditions in which different socio-cultural groups of people and each individual are valued, accepted and respected for their unique skills, experience and development prospects; in which they are given equal opportunities to participate in the success of KMG
Candace	a person belonging to a special group of the population, who is an ethnic Kazakh and (or) members of his family of Kazakh nationality, who previously were not citizens of the Republic of Kazakhstan, arrived in their historical homeland and received the appropriate status in accordance with the legislation of the Republic of Kazakhstan.
Person with disabilities	a person belonging to a special group of the population who has a health disorder with a persistent disorder of body functions caused by diseases, injuries (wounds, traumas, contusions), their consequences, defects, which leads to disability and the need for social protection
Migrant	a person belonging to a special population group who entered the Republic of Kazakhstan and left the Republic of Kazakhstan, as well as resettling within the Republic of Kazakhstan, regardless of the reasons and duration
Diversity	empowering people based on respect and recognition of the value of differences between them based on age, gender, ethnicity, religion, disability, education, nationality, abilities, social origin and other characteristics
Appeal	an application or complaint sent in written (paper and/or electronic) or oral form, as well as in the form of videoconferences, video messages
The UN	The United Nations
Human rights	the inalienable rights of all persons, determined by their belonging to the totality of human personalities. which are based on the recognition of the inherent dignity of the human person, as well as the freedom and equality of all people.
Forced labor	all types of work or services that are required of a person under threat of punishment and for which that person has not voluntarily offered his services (article 2, paragraph 1, of the International Labour Organization Convention No. 29 on Forced or Compulsory Labour (Geneva, June 28, 1930)).

4. Respect for human rights

4.1. KMG undertakes the following obligations to respect human rights:

4.1.1 KMG respects the honor and dignity of individuals and maintains a working environment free from any manifestations of physical, psychological pressure, harassment, aggression, abuse or threats in the workplace from colleagues or management.

4.1.2 KMG recognizes the rights of employees to freedom of assembly and association, freedom of opinion and expression in accordance with the legislation of the Republic of Kazakhstan.

4.1.3 KMG does not allow any form of discrimination that leads to negative consequences for people based on their age, gender, ethnicity, religion, disability, nationality, social status or other other characteristics.

4.1.4 KMG strives for sociocultural diversity among employees at all organizational levels.

4.1.5 KMG recognizes equal opportunities for women and men, equal pay for equal work.

4.1.6 KMG does not allow child, forced and violent labour.

4.1.7 KMG does not tolerate violence in the workplace in any form.

4.1.8 KMG provides a safe and healthy workplace environment for all its employees.

4.1.9 KMG respects the rights, cultural characteristics, customs and values of local communities in the regions where it operates.

4.1.10 KMG is aware of the importance of its role in the regions where it operates and strives to promote their sustainable development. KMG adheres to generally recognized principles of social and environmental responsibility.

KMG conducts environmental impact assessments before starting projects, conducts public hearings to approve projects that may have an impact on the environment and the quality of life of the population, promotes transparent and proactive interaction with communities at appropriate stages of the project lifecycle, takes measures to minimize and eliminate environmental damage and ensures environmental protection measures.

4.1.11. KMG promotes the common values and sustainable development of the community by contributing to economic development in the regions where KMG operates and expanding the range of social benefits it can bring.

4.1.12. KMG has zero tolerance for bribery and corruption.

4.2. KMG adheres to the above principles in its relations with:

- employees;
- suppliers and contractors;
- by the local population in the regions where KMG operates;
- by other interested parties.

5. Diversity and inclusivity

5.1. KMG creates equal opportunities for all employees at every stage of promotion, training and development.

5.2. KMG promotes the values of diversity and meritocracy at all organizational levels.

5.3. KMG supports candidates from the regions of its presence, as well as migrants and migrants.

5.4. KMG respects the peculiarities of people with disabilities and considers them as an important component of collective diversity.

5.5. KMG strives to create a favorable working environment in which every employee would feel accepted, respected and heard.

5.6. KMG accepts that diversity and inclusivity contribute to the improvement of competitiveness, productivity and efficiency of its activities.

5.7. Ensuring diversity and inclusivity is the main practice of non-discrimination in KMG.

5.8. KMG provides equal rights and opportunities to all employees who have reached the age of majority, regardless of gender, in accordance with the labor legislation of the Republic of Kazakhstan.

5.9. KMG strives to fully involve women in every aspect of its activities and management by increasing the proportion of women in succession pools and managerial positions. At the same time, KMG takes a responsible approach to respecting women's rights in the workplace in order to minimize risks to their health.

5.10. KMG strives to provide employees with disabilities with accessible information about tools that facilitate their mobility, devices and assistive technologies, including new technologies, as well as other forms of assistance to create a comfortable and equal workplace environment.

6. Policy implementation

6.1. KMG recognizes and respects the rights and freedoms of stakeholders, provides maximum assistance in the observance of rights, and strives to raise awareness of human rights issues throughout the value chain.

6.2. On an annual basis, KMG trains employees in the principles of respect for human rights, including issues of diversity and inclusivity.

6.3. KMG is undertaking a variety of awareness-raising initiatives aimed at suppliers and contractors, business partners, and the general public in the regions where it operates.

6.4. In order to minimize any potentially negative impact of its activities on human rights, KMG exercises due diligence with respect to human rights by regularly identifying, analyzing and assessing potential risks of human rights violations and developing timely responses before adverse consequences occur, with appropriate reporting.

6.5. KMG regularly analyzes the main risks related to the observance of human rights.

6.6. KMG takes measures to prevent human rights violations.

6.7. If KMG determines what caused or contributed to negative impacts on human rights, KMG is ready to apply legal procedures to combat such impacts, cooperate with stakeholders and find a way out of the situation through dialogue when employees or others believe that their rights have been violated.

6.8. KMG publishes relevant data on human rights compliance in accordance with generally recognized international principles and standards in the field of non-financial information disclosure in the integrated annual report of KMG.

7. Consideration of appeals

7.1. KMG ensures the operation of complaint handling processes designed to be legitimate, accessible, predictable, fair, and transparent.

7.2. KMG ensures the functioning of formalized and accessible channels for external and internal stakeholders to submit and review applications, ensuring anonymity and confidentiality, unbiased consideration, non-discrimination or other negative consequences for the applicant and receiving feedback on the results.

7.3 Every request received is subject to thorough verification. At the same time, the legislation of the Republic of Kazakhstan regulates the procedure for reviewing appeals.

7.4 The process of reviewing complaints and requests is regulated in the Code of Business Ethics of NC KazMunayGas JSC, the Confidential Information Policy of NC KazMunayGas JSC, the Rules for Reviewing Complaints concerning Violations of the Legislation of the Republic of Kazakhstan, internal documents of NC KazMunayGas JSC and its subsidiaries and affiliates, directly or indirectly affecting anti-corruption issues.

For all issues, including those related to human rights, employees of KMG and its subsidiaries and affiliates can contact the compliance service or the Ombudsman service.

7.5. The Policy is put into effect from the moment it is approved by the Board of Directors of KMG.

7.6. The responsible department analyzes the Policy at least once a year for its relevance and determines the expediency of its revision and/or amendments and additions. If it is advisable to revise the Policy, a new version or amendments/additions to it are submitted for approval by the KMG Board of Directors in accordance with the established procedure.

8. Final provisions

8.1. This Policy is subject to periodic review to ensure compliance with international standards in the field of human rights protection and relevant provisions of the legislation of the Republic of Kazakhstan.

8.2. KMG openly declares its rejection of human rights violations and makes this Policy freely available on the corporate website.

8.3. KMG takes measures to ensure that employees are familiar with this Policy and share a commitment to respect for human rights.

Complaint Handling Contacts

1. The Ombudsman:

- Tel.: +7 (7172) 78-65-61
- E-mail: ombudsman@kmg.kz

2. Compliance Service:

- Hotline: 8 (800) 080-47-47
- WhatsApp: +7 (771) 191-88-16
- E-mail: mail@sk-hotline.kz

3. Nysana Unified Hotline:

- Tel.: 8 (800) 080-30-30
- WhatsApp: +7 (702) 075-30-30
- Portal: nysana.csc.kz