

ANTI-CORRUPTION POLICY

Objective: Establish controls within the company so as to ensure compliance with all of our anti-corruption regulations.

Definition: Corruption is the offering of inducements or rewards in order to gain any commercial or contractual advantage or the asking for illegal action.

Policy: Conduct our company's business in an honest manner with a **NO** tolerance approach to corruption. Act professionally, with integrity in our business dealings. Enforce effective measures to counter corruption. We uphold all laws and regulations that counter any form of corruption in our dealings everywhere.

Who & what does it apply to: It applies to third parties: individuals or companies who are or could be clients, suppliers, agents and consultants - all, working at all levels. Any form of benefit, whether gifts, payments, contributions, etc... are forbidden. Facilitation payments & Political contributions must not be paid. Charitable contributions are acceptable provided they are not a concealed contribution, are public and subject to express approval of management.

Understanding: All employees must read & understand this policy. All must actively avoid any activity going against the letter and the intent of this policy. Anyone who breaches our policy will face disciplinary action.

Records: Financial records are kept and have put in place controls which will clarify the motivation for each payment made to suppliers and any other third party. Expenses are surveyed and follow our policy in the matter. All expenses need justifications. Books are audited each year.

Training: Training is needed for employees and particularly when new employees join, they should receive a full briefing on this policy. Such trainings are to be held regularly.

This Policy also will be clearly communicated to outside suppliers, clients and other third parties.

Responsibility: The General Director and in his absence, the board of directors are responsible for this policy to be scrupulously implemented.

Reviews: The General Director is to monitor the implementation of the policy on a regular basis and make improvements in terms of both implementation and policies as needed. All employees in the company are responsible for the success of the implementation of our policy. All comments on the policy and its implementation are welcome at any time.

Signed by 

Dam Jan Gerrit
General Director

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ЖАУАПҚЕРШІЛІГІ ШЕКТЕУЛІ СЕЗІМДІ
ТӨВӘРИШЕСТВОСЫ АТТІ
РЕСПУБЛИКА КАЗАҚСТАН