
 FREEDOM TELECOM	Code of Ethics and Business Conduct Freedom Telecom Operations LLP	Revision No. 1
		SI No. -
		Page 1 of 14

Annex No. 1
to the decision of the Management
Board of Freedom Telecom Operations LLP
dated May 27, 2024
(Protocol No. 14)

Code of Ethics and Business Conduct Freedom Telecom Operations LLP

Status	Document developed by	Document owned by
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 FREEDOM TELECOM	Code of Ethics and Business Conduct Freedom Telecom Operations LLP	Revision No. 1
		SI No. -
		Page 2 of 14

Contents

1. PURPOSE AND SCOPE OF APPLICATION	3
2. REGULATORY REFERENCES.....	3
3. DEFINITIONS AND ABBREVIATIONS	3
4. KEY PROVISIONS OF THE CODE.....	4
5. NORMS OF ETHICS AND BUSINESS BEHAVIOUR.....	5
6. LIABILITY	11
7. CONCLUSION.....	11
8. ANNEX.....	12
9. APPROVAL SHEET.....	13
10. LIST OF ACKNOWLEDGEMENT.....	14

1. PURPOSE AND SCOPE OF APPLICATION

1.1 Code of Ethics and Business Conduct of Freedom Telecom Operations Limited Liability Partnership (hereinafter referred to as the Code) defines the principles of activity in the sphere of relations with employees, customers, suppliers, business partners, agents, interested parties and authorized state bodies, as well as rules and norms of conduct of employees of Freedom Telecom Operations LLP (hereinafter referred to as the Partnership).

1.2 This Code is developed in accordance with the requirements of the legislation of the Republic of Kazakhstan, taking into account generally recognized business conduct standards and norms.

2. REGULATORY REFERENCES

2.1. The following regulatory documents are referenced through this Code:

No.	Document title
1	Law of the Republic of Kazakhstan "On Corruption Control" No. 410-V dated November 18, 2015
2	Articles of Association of the Partnership
3	OECD Council Recommendations on Public Integrity
4	ISO 37001-2016 Anti-Bribery Management Systems
5	ST RK ISO 37001-2017 "Bribery Control Management System. Requirements and guidelines for use"

3. DEFINITIONS AND ABBREVIATIONS

3.1. The following terms, abbreviations and their definitions shall apply in this Code:

Term/abbreviation	Definition
Internal Regulatory Document (IRD)	A document adopted for the purpose of standardization and regulation of the Partnership's activities, approved in accordance with the established procedure;
Document	Tangible, identifiable information created, received and retained by an organization or individual as evidence in support of legal obligations or activities;
Partnership	Freedom Telecom Operations Limited Liability Partnership;
Managerial employee	CEO-1, CEO-2 level executive;
Official	Members of the Partnership executive body;

Confidential information	Information defined and protected by the Partnership, to which a limited number of persons have free access on a legal basis. Disclosure, obtaining, use of this information by third parties may cause loss to the Partnership interests;
Conflict of interest	Conflict between personal interests of employees and their official powers, where personal interests of employees may lead to non-performance and (or) improper performance of their official duties.

4. KEY PROVISIONS OF THE CODE

4.1. Aims and objectives of the Code

4.1.1 The results of the Partnership's work show that one of the most important components of success in business, allowing to achieve maximum efficiency is constant adherence to the rules of business ethics. Therefore, high ethical standards are essential to maintain public and customer confidence in the Partnership and to create a strong foundation for effective and long-term co-operation with customers and other participants of the telecommunications market. To this end, this Code has been developed and approved.

4.1.2 The main objectives of the Code are to improve, streamline and regulate the Partnership's relations aimed at improving the efficiency of corporate governance and promoting successful interaction with employees, customers, suppliers, business partners, stakeholders and authorized state bodies through the application of generally accepted standards and norms of business conduct.

4.1.3 The objectives of the Code are to create the necessary conditions aimed at achieving a balance between the interests of the Partnership and its employees, clients, suppliers, business partners, stakeholders and authorized state bodies, contributing to the efficiency of the Partnership's activities and the formation of a high corporate culture among the Partnership's employees.

4.1.4 The Code is aimed at strengthening and improving the image of the Partnership and its employees, ensuring that the Partnership's employees observe the standards of professional conduct and follow the rules of business ethics, creating and maintaining a favorable moral and psychological climate in the Partnership's team.

The Code is binding for all employees of the Partnership.

4.2. Values of the Partnership

The fundamental corporate values, on the basis of which the Partnership's activities are formed, are ensuring full compliance in its activities with the requirements of the legislation of the Republic of Kazakhstan and this Code, ethical standards and generally accepted norms of business ethics, customer focus and teamwork, competence and expertise of the Partnership's employees, efficiency of their labor, honesty and integrity, responsibility and reliability, information publicity, mutual assistance, respect for each other, and all stakeholders' recognition and admiration of rights.

4.3. Principles of Business Behavior

The principles of the Partnership's business behavior are:

- 1) compliance with the law;
- 2) fairness;
- 3) transparency;
- 4) responsibility.

4.4. Prevention of conflicts of interest

Conflict of interest issues in the Partnership are regulated by the Conflict of Interest Policy of Freedom Telecom Operations LLP.

In order to prevent conflicts of interest, the Partnership should be guided by the following principles:

1) non-allowance of personal interest of officials and managers when making decisions on issues within their competence. The decisions made must always serve the interests of the Partnership. Personal attachments and judgements must never influence business decisions on behalf of the Partnership;

2) officials and employees of the Partnership at any level must avoid conflicts of interest, including agreeing on decisions concerning themselves, hiring relatives in direct subordination, providing services to competitors of the Partnership, close or kinship relations with a contractor, carrying business activities to the detriment of the interests of the Partnership and other situations that may affect the interests and image of the Partnership;

If an actual or potential conflict of interest is discovered, the employee must immediately notify his or her immediate supervisor in writing.

The immediate superior shall notify the Compliance Service, which shall assess the extent to which such conflict may affect the interests of the Partnership and take a proper decision to resolve it.

All employees of the Partnership are responsible for making fair and good decisions free from conflicts of interest.

5. NORMS OF ETHICS AND BUSINESS BEHAVIOUR

5.1. Internal relations

5.1.1 The Partnership undertakes the following obligations:

- 1) unconditional priority to the life and health of employees;
- 2) respect for human rights;
- 3) respect for the dignity and trustworthiness of employees with equal opportunities for everyone to recognition of their own potential;
- 4) exclusion of any form of discrimination on the grounds of ethnicity, nationality, religious or political beliefs, disability, gender, age, sexual orientation, status, membership of organizations or trade unions;

5) not to subject anyone to harassment, humiliation, sexual harassment, psychological or other violence in the workplace, facts of offensive or unacceptable behavior, from the

position of universal moral and ethical values;

- 6) prohibition of the use of child and/or forced labor;
- 7) fulfillment of the employer's obligations to employees;
- 8) delegating the necessary authority to each employee to fulfill their job duties;
- 9) prevention of attempts to interfere with personal, friendly, family and kinship relations in the implementation of the principle of equal opportunities and their influence on the employee's effective decision-making;
- 10) non-disclosure of information containing confidential information;
- 11) avoiding conflicts of interest;
- 12) creation of conditions for professional development of employees in order to ensure improvement of the quality of work performed and achievement of set goals;
- 13) evaluating on merit the contribution of employees, providing for their encouragement for their achievements in work, based on the objectives of the Partnership in accordance with the internal documents;
- 14) Conducting activities with respect for the environment and respect for the community with which it interacts;
- 15) occupational, industrial and general safety and environmental protection - no accidents, no harm to health and no damage to the environment.
- 16) focus on taking into account environmental (Environmental), social (Social) and governance (Governance) aspects in the Partnership's activities and assessing their sustainability and impact on the environment, society and internal management structure, in order to achieve sustainable development, improve the Partnership's results and create a positive impact on society and the environment.

5.2. Duties of employees

5.2.1 Employees of the Partnership shall:

- 1) observe in his professional activity the norms of the legislation of the Republic of Kazakhstan, the Code, standards and generally accepted norms of business ethics, administrative and internal documents related to the Partnership's activity;
- 2) consistent with the business image of the Partnership;
- 3) represent and protect the interests of the Partnership, make a Labor contribution to the achievement of the strategic goals of the Partnership, and bear personal responsibility for the quality and results of their work;
- 4) reasonably and in good faith to fulfill professional functions, avoid conflicts of interest, act with the necessary care and diligence in the interests of the Partnership;
- 5) not to subject anyone to harassment, humiliation, sexual harassment, psychological or other violence in the workplace, facts of offensive or unacceptable behavior, from the position of universal moral and ethical values;

- 6) avoid conflicts of interest when dealing with customers, partners, suppliers, business competitors and other persons;
- 7) be responsible for fulfilling the obligations set in this Code, regardless of status or position, in accordance with the commitment to accept and comply with the Code;
- 8) be polite and correct, respect the honor and dignity of colleagues and other persons, not allowing the use of profanity, manifestations of discrimination on the grounds of origin, social, official and property status, gender, race, nationality, language, religious and other beliefs, place of residence or any other circumstances, in accordance with the Constitution of the Republic of Kazakhstan;
- 9) be guided by the interests of the Partnership in the performance of his/her official duties, excluding interest and use of his/her official position for personal purposes, consider unacceptable the misappropriation of tangible and intangible assets/goods of the Partnership;
- 10) immediately report any personal commercial or other interest (direct or indirect) in transactions, contracts, projects related to the Partnership or other matters to the immediate superior, the Compliance Service or the Partnership's management in accordance with the established procedure;
- 11) contribute with their attitude to work and behavior to the creation of a stable positive moral and psychological climate in the team and the corporate spirit of the Partnership, excluding the occurrence of conflict situations;
- 12) provide reliable information in a timely manner in compliance with the confidentiality norms stipulated by the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Partnership;
- 13) consider applications of citizens and legal entities in a timely manner, take necessary measures on them and provide a response within the established deadlines;
- 14) make decisions in accordance with the requirements of this Code, demonstrate to the ethical standards established in the Partnership and reflected in this Code by personal example commitment;
- 15) Promote team cohesion as a team united by common goals, values and principles;
- 16) not to allow unjustified accusations, rudeness, humiliation of human dignity and tactlessness towards subordinates;
- 17) not to force subordinates or other employees of the Partnership to commit unlawful misdemeanours or acts incompatible with generally accepted moral and ethical norms;
- 18) to fulfill their functional duties in good faith, rejecting the practice of unlawful receipt (granting) of property benefits and advantages, receipt (giving) of gifts;
- 19) act in the interests of the Partnership in relations with employees, customers, suppliers, business partners, interested parties and authorized state bodies;
- 20) be guided in decision-making by the principles of expediency, transparency, and integrity;
- 21) fight with corruption in all its forms and manifestations;

22) improve professional competence by studying and mastering the latest achievements in the field of new technologies, seeking the professional assistance of colleagues (if necessary) when performing the assigned tasks;

23) pass on to colleagues the positive experience of their work and acquired knowledge;

24) adhere to the rules of behavior in the team, the culture of telephone conversations, the norms of business style in dress during the performance of their official duties in accordance with the provisions of the Partnership's internal documents;

25) not to act on behalf of the Partnership without being authorized to do so;

26) not to use official position for personal gain;

27) report security incidents as well as identified vulnerabilities in the Partnership's processes;

28) comply with safety measures, do not allow bypassing, violation of the established safety measures;

29) do not mix personal and professional, avoid using corporate devices and software for personal tasks or personal devices for corporate tasks, with proper authorization and with observing security measures.

5.2.2 When considering a negative situation of ethical nature, as well as facts of corruption and other unlawful actions, only verified facts and reliable information should be used.

5.2.3 All facts of violation of ethical norms in accordance with this Code, as well as facts of corruption and other illegal actions shall be considered in accordance with the norms of the legislation of the Republic of Kazakhstan and the Partnership's internal documents.

5.2.4 Each employee of the Partnership shall read and acknowledge this Code and and observe the Code of Conduct (Annex to this Code), read and acknowledge in due time amendments and/or additions to the Code and shall take all necessary measures to comply with the provisions of this Code.

5.2.5 All employees realize and understand their important role in the activities of the Partnership.

5.3. External relations

5.3.1 In relations with state authorities and/or third parties, employees shall:

1) observe normative legal acts of the Republic of Kazakhstan, acts of authorized state bodies, international treaties ratified by the Republic of Kazakhstan, the Charter of the Partnership and other internal documents regulating the activities of the Partnership;

2) be guided by the principles of partnership, and respect;

3) fulfil its obligations to the state in a timely and complete manner;

4) co-operate with public authorized bodies on the basis of fair, equal and lasting conditions of professional activity;

5) comply with prohibitions on giving gifts or anything of value (including favours, promises) to representatives of state bodies and persons equal to them, including members of their families, in order to gain a non-competitive advantage;

6) defend the legitimate interests of the Partnership in court, if -of-court actions have failed;

7) observe the principles of transparency in the activities of the Partnership, in particular, to disclose the necessary information on the results of its work that does not constitute commercial, official secrets and other secrets protected by law.

5.3.2 The Partnership endeavors to work with reliable business partners who have a good reputation and comply with legal requirements.

5.3.3 The Partnership's employees shall adhere to high standards of professional ethics in their work, when communicating with clients, suppliers, business partners and stakeholders and shall be guided by the following:

1) employees involved in the process of selecting a business partner (supplier, agent, contractor, etc.), entering into contracts and payment should ensure that the contractor and the transaction are properly checked and approved;

2) receiving cash and cash equivalents (money certificates, vouchers, gift cards, currency, etc.) as a gift is strictly prohibited regardless of the amount;

3) gifts must not destroy the business reputation of the Partnership. It is prohibited to give and/or receive gifts, hospitality or any other equivalent in the form of invitations to cultural and entertainment events from/for clients, business partners of the Partnership and/or third parties, discounts on works and/or services, subscriptions, etc. while waiting for a decision to be made, e.g. tenders, court proceedings, audits, site inspections and other processes that may give the impression of bribery;

4) focus on customer needs and guarantee of high quality of services provided;

5) expression of commitment to the principles of fair competition. The Partnership, as well as its business partners, is expected to comply with the requirements of antitrust laws;

6) compliance with sanctions legislation.

5.3.4 In relations with citizens and legal entities, the Partnership's employees shall contribute to building confidence in the Company, forming its positive image. It is necessary to avoid situations when receiving or transferring gifts/services may cause potential, actual conflict of interests.

5.3.5 In social relations:

1) develop and support social initiatives aimed at improving the quality of life of the Partnership's employees;

2) apply a transparent and coordinated mechanism for financing socially oriented activities;

3) observe the rules of behaviour in public space (mass media, social networks);

4) only authorized persons of the Partnership for public relations may comment publicly on the Partnership's position on issues relating to politics, religion, social and other issues and events.

5) support environmental protection activities and strive to ensure that its activities comply with the requirements of the environmental legislation of the Republic of Kazakhstan.

The Partnership strives for high ethical standards in its relations with the public and mass media, does not allow dissemination of inaccurate (incorrect) information, concealment or distortion of facts in publications and speeches of the Partnership's managers or its employees, in its information, advertising or other public relations materials.

5.4. Gifts and show a sign of hospitality

5.4.1 Freedom Telecom Operations LLP's Anti-Corruption Policy does not permit the giving and/or receiving of gifts, show a sign of hospitality or show a sign of hospitality to or received from third parties, except as provided for in Freedom Telecom Operations LLP's Anti-Corruption Policy.

5.4.2 Receiving and giving gifts and hospitality may create an unreasonable expectation on the part of the third party or the impression that you are favouring the third party for reasons of personal gain rather than for sound business reasons.

Gifts and hospitality may include not only cash, but anything of value offered or received by employees in the course of their activities with the Partnership.

5.4.3 Employees do not offer, seek or take money, cash equivalents, personal favours or any other illegal or inappropriate gifts and hospitality.

If gifts offered or received by employees could influence the decision-making process, such gifts are not acceptable.

5.5. Compliance with anti-corruption legislation

The Partnership complies with applicable laws as well as internal documents in the field of anti-bribery and corruption. Employees and third parties acting on behalf of the Partnership are prohibited from directly or indirectly offering, promising, giving or agreeing to give money or anything of value to anyone for the purpose of obtaining an improper advantage, obtaining or retaining business. The Partnership is opposed to any form of money laundering or terrorist financing.

5.6. Confidential Information

Employees of the Partnership are granted access to confidential information that is the property of the Partnership, in some cases - to information belonging to third parties within the established authorization (personal data of employees, clients, other information).

The Partnership's employees are obliged to take measures to protect confidential information and prevent its illegal collection, storage, processing, leakage or use for personal gain or other personal purposes. The use of confidential information for personal gain is a violation of the Code and the Partnership's internal regulations on official and commercial secrets.

In accordance with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Partnership, employees are prohibited from disclosing commercial, official and other secrets protected by law.

The Partnership's employees shall comply with the rules and procedures stipulated by the Partnership's internal documents and ensuring the security when working with confidential information.

5.7. Protection and use of the property

The Partnership's employees shall ensure that the Partnership's property and resources are protected and safeguarded, and that they are used appropriately and efficiently.

The Partnership's employees shall take all measures to prevent negligent, illegal or inefficient use of the Company's resources.

5.8. Accounting and Reporting

Proper accounting for all of the Company's transactions is critical to the operation of the Partnership. Employees of the Partnership are required to comply with all applicable accounting and reporting principles and standards. All payments and transactions must be properly negotiated, recorded and documented. The concealment, misrepresentation and deletion of accounting and financial documents or records is unacceptable and will result in appropriate action under applicable law.

6. LIABILITY

6.1 This Code is mandatory for the Partnership employees of all levels. For violation of the requirements stipulated by this Code, any employee of the Partnership, regardless of the position held, may be subject to appropriate types of disciplinary penalties in accordance with the procedure stipulated by the Labor Code of the Republic of Kazakhstan, as well as internal documents of the Partnership.


6.2 Managers are responsible for compliance with ethical norms and standards of professional activity in their structural subdivisions.

6.3 Violations of this Code should be reported to the Compliance Office via email at compliance@ftel.kz and other available communication channels. Harassment and harassment of a person who reports a violation in good faith is prohibited.

6.4 The ultimate owner of this Code is the Chairman of the Management Board of the Partnership, control over the implementation of this Code is vested in the management staff of the Partnership.

7. CONCLUSION

7.1 This Code may be amended and/or supplemented as necessary in accordance with the established procedure.

 FREEDOM TELECOM	Code of Ethics and Business Conduct Freedom Telecom Operations LLP	Revision No. 1
		SI No. -
		Page 12 of 14

Annex to the Code

OBLIGATION

on the acknowledgement and compliance with the Code of Ethics and Business Conduct of Freedom Telecom Operations Limited Liability Partnership

Me, _____

(specify full name, title, structural subdivision)


Having read and acknowledged the norms of the Code of Ethics and Business Conduct of Freedom Telecom Operations LLP (hereinafter - the Code), the policy, principles and values of Freedom Telecom Operations LLP regarding corporate business ethics and conduct, hereby agree with the norms established by the Code and undertake to comply with the requirements of the Code and be guided by them in my professional activities.

I accept personal responsibility for breaching the provisions of the Code and I also undertake to comply fully with it.

Full name of the employee _____

Employee signature _____

Date _____

 FREEDOM TELECOM	Code of Ethics and Business Conduct Freedom Telecom Operations LLP	Revision No. 1
		SI No. -
		Page 13 of 14

9. APPROVAL SHEET
(attachment of the DoSumentolog EDMS approval result)

