

# **KAZ MINERALS ANTI-BRIBERY AND CORRUPTION CODE**

## **SPECIFIC PRINCIPLES**

### **BRIBERY AND CORRUPTION**

No employee may directly or indirectly:

- offer, promise, grant or authorise the giving of money or anything else of value to a government official, a community leader or other person in a position of public trust, who hold a legislative, administrative or judicial position of any kind or performs a public function, to influence official action or obtain an improper benefit or advantage;
- offer, promise, grant or authorise the giving of money or anything else of value to a commercial organisation or an employee of a commercial organisation to obtain, retain or direct business or to induce a person to perform his duties improperly;
- offer, promise grant or authorise the giving of money or anything else of value to a third party knowing or believing that the acceptance of the advantage would itself constitute the improper performance of that third party's duties;
- use agents or other third parties to make improper payments or other benefits, or for masking their purpose, to obtain, retain or direct business or to obtain an improper benefit or advantage; or
- use their roles to solicit, demand, accept, obtain or be promised advantages.

### **Facilitation payments**

KAZ Minerals makes no distinction between bribes and so-called 'facilitation' payments, which are also prohibited. Facilitation payments are payments made to secure or speed up routine legal government actions, such as issuing permits or releasing goods held in customs. If there is cause for suspicion, a payment will only be made where it is permitted under written local law.

### **Gifts and hospitality**

Employees must not solicit gifts or hospitality in any circumstances. Modest hospitality may be given or accepted provided that it does not place the recipient under any obligation, is reasonable and proportionate, is not recurring or systematic and does not influence business-making processes or cause others to perceive an influence. Gifts of money will never be accepted.

### **Conflicts of interest**

Employees must not, without prior written consent obtained in accordance with KAZ Minerals' Code on Conflicts of Interest, have any direct or indirect interest in any supplier, customer, competitor or other business partner of KAZ Minerals which conflicts or appears to conflict with the best interests of KAZ Minerals. Employees must act solely for the benefit of KAZ Minerals and not be influenced by a personal, social, financial or political interest

which interferes or has the potential to interfere with the employee's objectivity and loyalty to KAZ Minerals.

### **Relationships with business partners**

KAZ Minerals is committed to conducting its business with integrity and to upholding the highest ethical standards in all its business dealings. KAZ Minerals expects the same of its suppliers, customers, consultants, agents and any other business partners.

Because KAZ Minerals needs to ensure it conducts business only with reputable individuals and entities that are involved in legitimate business activities and whose funds are derived from legitimate resources, KAZ Minerals will undertake due diligence on suppliers, customers, consultants, agents and other business partners to ensure they are suitable to do business with and do not commit or attempt to commit any illegal actions on their own or KAZ Minerals' behalf, including engaging in any form of bribery and corruption.

### **Political contributions**

KAZ Minerals does not participate directly in party political activity whether local, regional or national and does not make contributions to political campaigns, political parties, political candidates or any of their affiliated organisations.

KAZ Minerals recognises employees' rights to participate as individuals in the political process, in ways that are appropriate to their country of residence. The participation of KAZ Minerals employees, including contributions of time or money, is carried out entirely on their own account and employees must be careful to make clear that their political opinions do not represent KAZ Minerals positions.

### **Speak Up**

Employees and those working with KAZ Minerals are encouraged to raise their concerns about any incidents of malpractice, misconduct or unlawful conduct in the workplace at the earliest possible stage. Employees who reasonably believe that inappropriate business conduct, or a violation of the law or an internal regulation is occurring should initially raise the issue with their manager as he/she will generally be closest to the situation and best able to help.

If an employee prefers, he/she can use the KAZ Minerals Speak Up facility to report inappropriate business conduct, or violation of the law or internal regulation by telephone or the internet. It is available 24 hours a day, 365 days a year, with multiple language support. The calls are answered by trained interviewers. The interviewer then reports the call to senior management, the matter is investigated and appropriate action taken.

KAZ Minerals will not tolerate retaliation or discrimination against any employee who in good faith seeks advice, raises a concern or reports any malpractice, misconduct, or violation of the law or internal regulation.