

APPROVED
by the Order of the Acting General Director of the
LLP «Synergized Gas Technology Kazakhstan»

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**Human rights and social responsibility policy of the
LLP “Synergized Gas Technology Kazakhstan”**

1. GENERAL PROVISIONS

1. This Human rights and social responsibility policy of the LLP “Synergized Gas Technology Kazakhstan” (hereinafter - Policy) is developed in accordance with the legislation of the Republic of Kazakhstan (hereinafter – legislation), Articles of the LLP “Synergized Gas Technology Kazakhstan” (hereinafter – partnership).

Corporate governance policy of the partnership:

- 1) of increasing of the system contribution to the practical and long-run solution of social problems of the Partnership;
- 2) of harmonious development of dialogue and cooperation between the Partnership and stakeholders;
- 3) of enhancing the partnership confidence and strengthening its reputation;
- 4) of formation the tangible contribution of socially-oriented programs and projects of the Partnership into the long-term business sustainability;
- 6) of improving the corporate governance practices.

2. In order to achieve the goals of the Partnership it is necessary to solve the following issues:

- 1) define the priorities and activities of the Partnership in the field of human rights and social responsibility;
- 2) define responsibilities and interaction within the Partnership;
- 3) organize a system of administration in the Partnership;

3. The partnership sees the role of social responsibility as a voluntary contribution of business to society in social, economic and environmental spheres, connected directly to the main activities of the Partnership.

4. The Partnership expresses the conviction that the social aspect is becoming increasingly important to business reputation, supports the spread of this trend in the world and is one of the tools that allows:

- 1) to increase the goodwill of business, capitalization of the Partnership, to establish effective and balanced relations with all stakeholders - the state, shareholders, customers, employees, partners, local communities;

- 2) to manage effectively the non-productive risks arising in the business process;
- 3) to ensure the progressive development of the business through the development of society (culture of consumption, access to new services, etc.).
5. The Partnership is actively involved in the implementation of priority state and industry programs of social character, international and socially significant national activities.
6. Definitions used, but not defined in this Policy, is used in the sense in which they are used in the Articles of the Partnership, in the Staff Regulations and other internal documents of the Partnership.
7. The Partnership in the prescribed manner shall ensure compliance to the following principles:
 - 1) in the field of human rights:
 - support and respect human rights;
 - ensure noninvolvement in human rights abuses;
 - 2) in the field of labor relations: support freedom of association and the effective recognition of the right to collective bargaining;
 - stand for the elimination of all forms of forced labor;
 - stand for the complete liquidation of child labor, forced labor;
 - stand for the liquidation of discrimination in respect of employment and occupation;
 - ensure the safety of the working conditions of employees, conducting health programs and social support of employees (financial, charity and sponsorship);
 - provide stimulation, training of employees
 - ensure the availability of personnel reserve, career development plans
 - develop corporate culture.
 - 3) in the field of environmental protection:
 - contribute to the prevention of negative impacts on the environment;
 - take initiatives aimed at increasing responsibility for the environment;
 - promote the development and diffusion of environmentally friendly technologies;
 - take initiatives to use alternative sources of energy, reducing energy consumption and improving energy efficiency.
 - 4) in the field of social support and charity:
 - carry out various activities aimed at supporting vulnerable segments of the population;

- provide individuals and non-profit organizations with financial, charity and sponsorship support in the prescribed manner.

5) in the field of interaction with society:

- promote long-term economic stability and competitiveness of the economy of Kazakhstan;
- ensure the implementation of state policy (in the framework of the State program of Accelerated Industrial and Innovative Development of the Republic of Kazakhstan, and as the sole shareholder);
- prevent corrupt practices of management and employees of the Partnership and carry out anti-corruption measures (in accordance with the legislation);
- ensure compliance with the requirements (specifications, existence of fine sanctions for violation of requirements of the legislation, terms of international treaties, etc.);
- timely implementation of obligations to pay taxes and other payments of the partnership to the state budget;
- anti-money laundering;
- promote the creation of new jobs in the regions, the implementation of partnership projects;
- respect the principles of fair competition.

6) in the field of transparency, protection of rights of investors and clients:

- comply with all the conditions of the agreements with investors and customers;
- continuously improve customer service standards and quality of services of the Partnership;
- objectively and accurately disclose the results of operations and plans for the development of the Partnership;
- timely disclose the information about significant events that may influence the decisions of interested parties of the Partnership;
- follow the prohibition on the use of insider information.

3. PARTNERSHIP AND INTERESTED PARTIES

8. The Partnership shall not separate from each other concepts of human rights and social responsibility and sustainable business development. Ensuring the sustainable business development and achievement of the strategic goals is only possible with due regard to the interests and responsible behavior towards all interested parties of the Partnership.

9. In order to implement successful and effective policies, it is crucially important to identify priority stakeholders and interest groups for the Partnership, to find out their expectations and suggest efficient forms of cooperation ranging from dialogue to possible joint activities and programs. In particular, the following target groups are classified as the main interested parties having the common interests with the Partnership:

- 1) The sole shareholder and the investors - have a direct interest in the long-term sustainable growth of the value of the Partnership, its ability to manage risks and minimize them, openness and ethics of principles and practices of the corporate governance.
- 2) The central and local public authorities - are interested in the fullness and challenging nature of the taxation, the adequate participation of the Partnership in the implementation of priority strategies of socio-economic and cultural development of country and regions, infusing business approaches and modern management techniques into the social sphere.
- 3) The customers - are interested in the quality of services, improvement of legal mechanisms to protect their rights, the growth of investment and innovation.
- 4) The employees - expect full implementation of the legislation provisions on labor relations and provisions of employment agreements; respect of the human rights and dignity by the management; daily care of the Partnership about minimizing hazardous wastes to health and environment; targeted assistance in the development of their qualifications and direct impact of the business success on salary and the nature of the additional social package.
- 5) The business partners - are interested in the widest possible spread of the principles of transparency, impartiality and fairness, adherence to moral standards supported by legal acts and corporate ethics codes.
- 6) Public and non-governmental organizations (hereinafter - NGO) and civil society - are interested in an adequate and timely informing the Partnership about the expectations and concerns of local communities, increasing the transparency and the efficiency of the central and local public authorities, ensuring the autonomy and independence of public organizations and the growth of their expert potential.

Taking into account the importance of the entire variety of tasks in the field of ecology, the Partnership allocates the environmental NGOs into a separate group of stakeholders. It is necessary to conduct in-depth dialogue with them, which shall allow the identification of a set and the sequence of practical measures for the gradual bringing of environmental policies and practices of the Company to the level of international standards.

10. The development of a structured dialogue and effective cooperation with the interested parties on the basis of balance of interests has certain conditions and restrictions. Interested parties shall also be aware of their responsibility in society and adhere to the principles of ethics in their relations with business and with each other.

11. According to accepted international principles of corporate social policy, the Partnership is outside the politics and is outside the religion. Political preferences and worldview positions of employees are their private matter, but the Partnership will refrain from participation in political life and do nothing to interfere in the affairs of religions.

4. PRINCIPLE DIRECTIONS

12. Human rights and social responsibility - is the philosophy of long-term and sustainable development of the Partnership, which allows to harmoniously integrate successful business with basic human values and national development priorities. Socially responsible approach to business provides:

- 1) high-quality customer satisfaction;

- 2) strict compliance with legislation;
- 3) ensuring occupational safety and investing in human potential development;
- 4) caring for the Environment;
- 5) efficient investment in production development, aimed at improving the competitiveness of the Company in its interests and the interests of society;
- 6) consideration of expectations and opinions of the interested parties, system approach to building of trustworthy and mutually beneficial relationship with them based on ethics requirements;
- 7) contribution to the development of local communities, in particular through the establishment of mutually beneficial social partnerships;
- 8) openness and transparency, the development of social reporting.

13. The employees shall be the main asset and the key interested party of the Partnership. The objectives of the business development dictate the necessity to give priority attention to involvement and retention of the talented employees, training and development of the staff, as well as to define a policy in the social sphere and in the sphere of labor relations.

14. The purposes of policy of the Partnership in the field of the employees' working conditions are:

- 1) involvement, motivation and retention of the talented and enterprising specialists;
- 2) constant updating of knowledge and development of skills to perform current and future business objectives of the Partnership;
- 3) development of management potential and ensuring of highly professional and sustainable management of the Company;
- 4) creation of favorable working conditions ensuring health care for all employees.

15. Caring for the environment and reduction of the impact of business on the environment shall be the important strategic objectives of the Partnership.

1) Ecological sustainability of the Partnership shall be achieved by investing in the improvement of the environmental performance of the business and rational use natural resources. At the same time, the Partnership shall be aware that the vehicles for collection, check and analysis of the information on the environment need further improvement.

16. System collaboration with local authorities and communities is very important for the Partnership, since the well-being of the cities and the living conditions of the families of employees directly affect the healthy and constructive atmosphere in the Partnership. Providing the Partnership with the staff and the human resources depends on quality of life and desire of people to live and work in the cities where branches and representations of the Partnership are located. On that basis the Partnership undertakes a proper part of responsibility for the situation in the territories of presence, but the Partnership does not replace or substitute the responsibility of local authorities for the lives of communities. The Partnership believes that the practice of "forced charity" is unconstructive and prospectless.

17. The Partnership shall be responsible to the local communities and work in collaboration with all the interested parties to improve the quality of life in communities. The Partnership ready to support the program of the local authorities which corresponds with their strategic plans of socio-economic development; moreover, the Partnership actively assists the local authorities to have the opportunity to obtain expert advice in the development of such plans.

18. The principles of the policy in relations with local communities:

- 1) strategy for socio-economic development and the relevant programs shall be justified, feasible and aimed at long-term results. On that basis the efficiency of the investment shall be traced both by local authorities and the Partnership;
- 2) programs of interaction with local communities shall be combined as much as possible both with the strategic questions of development of business, and with the opinions of inhabitants of regions of presence of the Partnership concerning the priority of the social problems;
- 3) cooperation with local authorities shall be formalized by contracts or protocols of intentions;
- 4) social and investment activities of the Partnership based on the principles of openness, dialogue, cooperation and partnership.

19. Charitable assistance can be provided in the following areas:

- 1) modern education,
- 2) healthcare and sport,
- 3) cultural possessions and development.

20. Objectives and principles of the policy in the field of charity are:

- 1) charitable donations shall be directed to the solution of social problems and (or) support for vulnerable populations, as well as - in exceptional cases - for particular individuals who are in difficult life circumstances;
- 2) The Partnership will not act as a sponsor of political events or provide assistance to political parties; as well as religious institutions or activity aimed at support of any denomination or religion;
- 3) charitable support of the Partnership is always based on transparency and openness in expenditures; in accordance with the legislation the charity recipients shall submit reports enabling to control intended expenditure of allocated funds.