

**APPROVED**

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

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## **Anti-corruption policy**

LLP «Synergized Gas Technology Kazakhstan»

Management of the Limited Liability Partnership «Synergized Gas Technology Kazakhstan" (hereinafter - the Partnership) has approved the principles stipulated in this Anti-corruption Policy (hereinafter - the Policy). We expect from every employee the compliance with the provisions of this Policy in their daily activities as our business practices. We are also working on the adoption of the principles of this policy throughout the companies in which the Partnership has the participation interest.

The Partnership adheres to the highest standards of business conduct. We act responsibly on the basis of a system of values and principles. We adhere to free and fair trade, we are committed to fair competition and business decisions based on ethical principles within the legal provisions of the country in which we operate.

We interact with a variety of the interested parties, such as customers, suppliers, consultants, business partners, government and regulatory bodies. Assets of the Partnership which are located in the territory of the Republic of Kazakhstan and abroad, do not bribe or receive bribes or other illegal payments to obtain or retain business advantage. Management is committed to principles to take effective measures to prevent, control and liquidate corruption in any form.

Abovementioned approaches shall be the basis for the development of this Policy.

### **Prohibition on bribery**

None of the employee of the Partnership shall not offer, create the conditions for, allow, ask, accept or receive a "bribe", directly or indirectly, including through any third party or carry out own functions improperly in expectation of bribes or of receiving bribes as a result of such action.

"Bribe" means - to offer, to create conditions for, allow, to ask for, to accept, or to gain an advantage in terms of financing or other, if the aim of the reward is to encourage improper performance or excess of powers covered by employee's position.

It is also prohibited to donate funds to other parties in a manner that could create the conditions of funding of bribery as a result of acts allowed by rough negligence. Situations involving a known risk of being involved in corruption shall be brought under proper control, and it shall be carried out preventive measures to ensure that the funds paid to third parties, such as agents, partners, suppliers, and consultants could not be used for corrupt purposes.

### **Conflict of interest**



The conflict of interests in the present document is understood as a situation at which personal interest (direct or indirect) of the company's employee influences or may influence appropriate execution of official duties by him/her and at which there happens or may be happen a contradiction between personal interest of the employee and legitimate interests of citizens, societies and the state.

Personal interest of the official of the Partnership which influences or may influence appropriate execution of official duties by him/her, is understood as the possibility of receiving by the official of the income in the form of money, values, other property or property-related services, other property rights for own or for the third parties in discharge of functions.

In order to prevent and settle the conflict of interest, employees of the Partnership are obliged:

- a) to take measures to prevent any possibility of the conflict of interest.
- b) Partnership's employees shall avoid any contacts that might lead to or cause the conflict of interest between personal activities and the Partnership's business.
- c) to notify immediate supervisor about the occurred conflict of interest or the possibility of its occurrence as soon as it becomes known to employee.

Prevention or settlement of the conflict of interest may consist in changing the official position of the employee, who is party to the conflict of interest, to the extent of employee's discharge from office duty in the prescribed manner, and (or) in the rejection by him/her from benefits, which is the cause of the conflict of interest.

### **Facilitation payment**

This policy prohibits paying or receiving payments as facilitation payments. Facilitation payments mean payments made towards public officials to perform or expedite routine procedures. Facilitation payments differs from the statutory fees for services, with the information about its size which is in the public domain.

### **Hospitality**

Justified, proportionated and allocated in good faith the amount for hospitality and gifts are generally recognized as part of doing business. However, such actions may potentially be construed as bribery and therefore are illegal.

Employees of the Partnership shall approve the proposal for the payment of the amounts associated with the hospitality and gifts only upon condition of provision of clear business verification of such expenses and their conformity with the nature of the business relationship.

Employees of the Partnership shall not approve proposals for the payment of the amounts associated with the hospitality and gifts, if they believe there may be a conflict of interest, that such payments may be perceived as an abuse of influence or pursuit of receiving business benefits by dishonest means.

Proposals for the hospitality and gifts may be submitted for consideration or accepted only in accordance with local legislation and this Policy upon condition of reasonableness and proportionality in the circumstances. If the employee has any doubts about the acceptable limits of the amounts, the employee shall contact his/her manager or the lawyer.



### **Political donations, charity and sponsorship**

The Partnership does not make political donations, donations for the purpose of charity or sponsorship, which may be considered as a substitute for political payments or used as a substitute of the given amounts of payments for the amounts intended for bribery.

The Partnership may sponsor events aimed at carrying out the events by the key partners that focus on customer satisfaction and implementation of activities.

According to the general rules, the Partnership gives its consent only for charitable activities or sponsorship, the implementation of which does not create preconditions for occurrence at the actual or potential customers, suppliers or government officials of any illegal obligations.

The Partnership has the right to support, to provide sponsorship, and to contribute to the work of other organizations, which coincides with the business objectives, values and ethical principles of the Partnership, and in the case where such action strengthens the reputation of the Partnership.

The Partnership is entitled to exercise the donation only for charitable purposes according to the principle of good faith.

### **Suppliers and business partners**

The Partnership expects from its employees the intelligent actions and following high ethical standards in interaction with suppliers and business partners.

The Partnerships selects suppliers solely on the basis of merit, and makes it clear that expects from them fair and active competition for the right to do business with the Partnership. We assess suppliers in terms of their products and services, based on predefined criteria, which implies principles of the fight against corruption.

Adherence to the principles expressed in this Policy possibly shall be an integral part of agreements with third parties that provide products or provide services to the Partnership.

The Partnership shall take appropriate steps to ensure that payments made to the address of any agent or business partner, represent only the sum of the corresponding remuneration for the provision of legitimate services by such agents or business partners. The Partnership also takes appropriate measures to ensure the elimination of transmission of any part of such payment by agent or business partner as a bribe.

### **Risk assessment and due diligence**

Identification and assessment of potential risks shall be the main elements of the business approach of the Partnership, and these principles also to be applied to corruption risks. Adequate and appropriate risk assessment shall be made to create the possibility of controlling corruption risks, including the implementation of the evaluation of potential actions to reduce the effects of such risks.

It is required an approach based on risk assessment to select suppliers and sub suppliers, as well as other business partners of the Partnership. Due diligence is carried out with respect to potential suppliers or partners to identify, to evaluate and to reduce the impact of corruption risks that may happen. It is also necessary to assess existing at present business relationships and to provide with constant monitoring in this regard.



## **Compliance, control of observance of legal standards and informing on corruption**

The Partnership shall establish and provide more detailed instructions, which, for example, provide with the relevant provisions on the levels of hospitality and gifts, as well as related corporate governance rules.

This Policy shall be managed by the relevant security service of the Partnership, which at least once a year reviews the content and monitors the compliance with this Policy. Daily monitoring of compliance with these principles, including regular information and training in the principles of fight against corruption, as well as the implementation of further activities associated with the constant control over compliance with the obligations arising from the provisions of this Policy shall be a part of the responsibility of each manager with the involvement of the relevant services. All actions arising from the provisions of this Policy shall be subject to regular review.

Each employee shall be responsible for own actions in accordance with the provisions of this Policy, and we encourage employees to voice both problematic issues and examples of best practice.

We urge employees to report about violations of this Policy by his/her immediate supervisor or to the security service. In order to report about cases of corruption it also may be used networking features. Regardless of the message channel, all messages about potential violations of this Policy, passed in good faith by the applicant will be promptly, impartially and fully investigated with the assistance of relevant internal and / or external resources.

It is necessary to promptly report about actions that are inconsistent with the requirements of this Policy, such actions shall be promptly corrected, and may involve disciplinary action up to termination of employment relations. Violation of the requirements of anti-corruption legislation is subject to registration with the police and may result in the imposition of serious penalties on the offender or imprisonment.

## **Cooperation in the field of anti-corruption**

The Partnership, based on the principle of mutuality cooperates in the field of anti-corruption with authorities, partners and customers in order to:

- a) identify the persons suspected of having committed corruption crimes, their location and the location of other persons involved in corruption crimes;
- b) identify property obtained from the commission of corruption offenses or which is means of their commission;
- c) exchange the information on anti-corruption and fight against corruption.

Measures to prevent corruption:

- Forming employees' intolerance to corrupt behavior;
- Anti-corruption expertise of administrative, regulatory, contractual documents, including the stage of their preparation and approval;
- Specify the qualification requirements for officials and candidates for executive positions in the company.

## **Security check of the third party**

Security check of the third party means determination of ability and willingness of managers to pay its debts and accountability of their actions (dependence on whomever). Prediction of this circumstance, with some degree of probability may be implemented based on the following information:

- duration and stability of the existence of this company
- presence / absence of long-term partners of the enterprise and their comments on cooperation
- presence in the ownership of a sufficient number of tangible assets at the studied company
- presence / absence of subsidiaries and parent companies
- presence / absence of fraud in the past history of the enterprise or past experience of the manager
- stability / changings of the current address
- stability / changing of the Management Board
- stability / changing of the founding members
- presence / absence of judicial or administrative proceedings involving the studied enterprise or its managers and their essence
- presence / absence of a stable connection with the crime
- withdrawals from the bank account of amounts far exceeding the payroll
- trend of deterioration of the financial condition of the studied enterprise (reduction of fixed and current assets, reduction of the finances on company's account)
- misuse of loan funds
- unjustified delay in the payment of any debt or negotiations

On that basis the work of collecting information on the due diligence of the legal entity may be organized as follows::

1. obtaining information from public sources;
2. obtain information from existing databases;
3. obtaining information from law enforcement authorities;
4. obtaining information about the participation of the company, its executives or founders in criminal matters, arbitration and civil legal proceedings;
5. obtaining information from the bank serving the studied enterprise;
6. obtaining information through company employees.