

APPROVED

by the decision of the Board of Directors of
"Almaty Social-Entrepreneurial Corporation"
Joint Stock Company

Appendices ____

to the minutes of the meeting of the Board of
Directors of "Almaty Social-Entrepreneurial
Corporation" Joint Stock Company

dated _____ 2023

No. _____

**CORPORATE SOCIAL RESPONSIBILITY POLICY OF ALMATY SOCIAL-
ENTREPRENEURIAL CORPORATION JOINT STOCK COMPANY**

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| Owner of IRD | Department of Strategy and Corporate Development |
| Developer of IRD | Department of Strategy and Corporate Development |
| Responsible for storing the copy of document | IRD Database Administrator |
| The place of storage of the original | IRD database |
| Responsible for monitoring and updating | Department of Strategy and Corporate Development |
| Information about documents that have become invalid due to the adoption of a new | No |
| Protocol of Disagreements | No |
| Number of appendices and pages | Without appendices, IRD on 8 pages. |

Almaty, 2023

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1. General provisions

1. Corporate Social Responsibility Policy (the Policy) of SEC Almaty JSC (Company), a long-term, public document adopted for the purpose of expressing ethical positions and accepting self-obligations in terms of ethical and/or socially responsible behavior, developed in accordance with the legislation of the Republic of Kazakhstan, the Charter and the Corporate Governance Code of the Company.

2. The priority of the Policy is development, systematization, improvement and implementation of social programs that contribute to improving corporate governance, contributing to solving public problems, improving and strengthening reputation, responsible behavior before all parties whose interests are affected by the Company's activities: employees, pensioners, shareholders, the state and civil society.

3. The main objective of the Policy is to create the necessary conditions for ensuring the social obligations assumed by the Company, contributing to the formation and development of its positive image.

4. The Policy addresses issues of responsibility to:

- society;
- state;
- financial institutions and other counterparties;
- employees.

5. Basic concepts, definitions, abbreviations used in this Policy:

1) Charitable organization – non-profit organization established for implementation of charity in accordance with the Law of the Republic of Kazakhstan "On Charity", the laws of the Republic of Kazakhstan, international treaties of the Republic of Kazakhstan;

2) Legislation – set of regulatory legal acts adopted in accordance with the established procedure;

3) Intangible assets – generalized name of factors that can influence the efficiency and profitability of production and are not related to tangible means of production (quality of human resources, quality of management, business reputation, etc.);

4) Employee – individual who is in an employment relationship with the Company, directly performing work under an employment contract;

5) Restructuring – changing the structure and number of employees of the Company in the course of organizational activities;

6) Socially responsible restructuring – the Company's efforts to smooth out and compensate for negative consequences for employees and the local population during the mass release of employees, delocalization and closure of production facilities, job cuts, reorganization;

7) Social responsibility – conscious attitude of the subject of social activity to the requirements of social necessity, civic duty, social tasks, norms and values, understanding the consequences of the activities carried out for certain social groups and individuals, for the social progress of society;

8) Ergonomics - field of knowledge dealing with the rational organization of the workplace.

2. Main Policy Directions

6. The main directions of the Company's Policy are:

- 1) impeccable compliance with the law;
- 2) implementation of state programs in the social sphere;
- 3) taking into account the expectations and opinions of stakeholders, systematic approach to building bona fide and mutually beneficial relationships with them;
- 4) provision of charitable and sponsorship assistance (if funds are available in the budget);
- 5) labor and environmental protection;
- 6) creating conditions to meet the needs of employees;
- 7) creating conditions for preserving and improving the health of employees;
- 8) development of human resources.

3. Policy Principles

7. The key principle of the Company's Policy is the principle of social responsibility, which ensures compliance with the principles enshrined in the United Nations Global Compact, and assumes:

- 1) in the sphere of interaction with society:
 - promote the strengthening of long-term economic stability and competitiveness of the economy of the Republic of Kazakhstan;
 - promote the creation of new jobs in the regions of project implementation;
 - strives to comply with the principles of fair competition;
 - ensure the principles of transparency, fairness and accessibility of any information to the public, with the exception of confidential information;
 - strives to comply with generally accepted moral and ethical standards.
- 2) in the field of human rights:
 - support and respect the observance of human rights proclaimed by the international community;
 - ensure its non-involvement in the violation of human rights.
- 3) in the field of social support and charity:
 - carry out various activities aimed at supporting socially vulnerable segments of the population;
 - provide individuals and non-profit organizations with material, charitable and sponsorship assistance in accordance with the established procedure.
- 4) in the sphere of responsibility to the state:
 - ensure the implementation of state policy within the framework of the ongoing projects of the State Program of Accelerated Industrial and Innovative Development of the Republic of Kazakhstan;
 - ensure the interconnectedness of the goals/interests of Company and the state on social issues;
 - continuity and long-term validity of the commitments made on social issues;
 - prevent corrupt actions of the Company's management and employees and carry out anti-corruption measures (in accordance with the legislation);
 - timely fulfill obligations to pay taxes and other payments of the Company to the state budget;
 - counteract the legalization of illegally obtained income.
- 5) in the field of transparency, protection of the rights of consumers and business partners:

comply with all conditions concluded with business partners;
 objectively and qualitatively disclose information about the results of the Company's activities and development plans;
 timely disclose information about significant events that may affect the decisions of the Company's stakeholders;
 comply with the prohibition on the use of insider information;
 ensure the safety and satisfaction of consumers.

6) in the field of labor relations:

support freedom of association and recognition of the right to conclude collective agreements in practice;
 advocate for elimination of all forms of forced and compulsory labor;
 advocate for complete eradication of child labor;
 advocate for elimination of discrimination in labor and employment;
 ensure the safety of workers' working conditions, implementation of health programs and social support for employees (financial, charitable and/or sponsorship);
 provide incentives, professional development of employees;
 ensure the availability of personnel reserve, career development plans;
 develop corporate culture;
 implement the principles of social partnership.

7) in the field of environmental protection:

contribute to prevention of negative impacts on the environment;
 take initiatives aimed at increasing responsibility for the state of the environment;
 promote the development and dissemination of environmentally sound technologies;
 take initiatives to use alternative energy sources, reduce energy consumption and improve energy efficiency.

8. Strategic and economic security - solution of social issues should be coordinated with the strategic priorities of the Company, be considered in the context of increasing its competitiveness and be ensured by the financial results of the Company's activities.

9. Consistency – solution of social issues is integrated into the Company's management system at the strategic level and management system of current activities, including the system of investment decisions, risk management system.

10. Targeting – taking into account the real needs of stakeholders, differentiated approach depending on specific conditions while following the principles of corporate social responsibility.

11. Activity – Company actively promotes modern approaches to solving social problems in regular dialogue with public authorities, trade unions, public organizations.

12. Efficiency – Company uses modern social management technologies taking into account the best world practice.

13. Fairness - objective assessment of professional qualities, remuneration of conscientious and productive work, significant contribution to the implementation of the Company's development strategy.

14. Honesty – Company does not make promises that it cannot fulfill.

15. Initiative – the Company's activity is not only the result of a reaction to any events taking place in society, but also aims at an active position on managing changes in the level of development of Company, contributing to its approximation to the best international standards.

16. Cooperation – Company strives to unite the efforts of all stakeholders in working on solving social problems, cooperating with state authorities, trade unions, public organizations.

17. Transparency – the objectives of the Company's Policy, the management system for its implementation and results achieved are covered in public corporate documents, on the official website, in the mass media.

18. Minimization of social and reputational risks – Company takes into account the social consequences of all its corporate and industrial-technical transformations, accompanies them with programs that minimize their social risks.

4. Corporate social support to the Company's employees

19. Socially responsible restructuring:

The Company undertakes to take a socially responsible approach to the restructuring of its divisions;

in case of mass release of employees, in addition to compliance with the law, strive to take all measures for maximum possible employment of released employees;

inform in advance about the Company's plans to reduce jobs, finance retraining of employees, and create new jobs.

20. Remuneration and motivation policy:

unity of policy of remuneration and motivation of work for all employees of the Company;

establishment of minimum guaranteed level of remuneration in the Company for all employees at a level exceeding the legally established minimum wage, based on the need to meet basic living needs and provide a certain income, taking into account local conditions;

use of efficiency management system in order to take into account the most complete individual labor contribution of an employee;

objectivity of the system of remuneration and motivation of employees and its competitiveness at the national level;

awarding with corporate awards.

21. Training:

conducting a targeted policy of professional training and retraining of its employees, improving their qualifications to perform current and future business processes;

training and development of employees in accordance with the Plan of training and advanced training of employees, individual plans of employees who are in the personnel reserve of the Company;

provision of paid study leave.

22. Policy on young workers:

development, attracting and retaining young, talented employees;

creation of personnel reserve for the purpose of career growth of young specialists.

23. Health protection:

ensuring the financing of measures aimed at protecting the health of employees;

monitoring the working conditions of the Company's employees to ensure the safety of the organization of work;

ensuring safe and ergonomic organization of workplaces;

monitoring the targeted and specialized protection of the rights of pregnant women, nursing mothers, mothers with many children.

24. Health improvement, sports and recreation:

organization of leisure time for employees at the corporate level;

carrying out sports and recreation work and the development of mass sports among employees and their family members, providing access to sports infrastructure;

conducting systematic promotion of healthy lifestyle among employees using corporate media;

annual allocation of funds for cultural events, purchase of New Year's gifts for children of employees under 14 years of age, purchase of valuable gifts;

25. Corporate social security and insurance:

provision of medical care to employees within the framework of voluntary medical insurance;

provision of financial assistance for anniversaries in accordance with the Company's internal documents;

providing financial assistance to employees during marriage registration;

provision of financial assistance in case of death of a close relative.

5. Socially responsible participation in the life of society

26. Support of culture and sports:

finding opportunities to provide material support to creative individuals and collectives, sports teams of various levels – from domestic to national teams, organizations of children's and youth sports.

27. Charitable and sponsorship activities of the Company and employees:

using available opportunities to provide assistance:

individuals – veterans of labor, disabled people, orphans, families of employees of the Company who died at work, as well as victims of natural disasters;

state budgetary organizations of social orientation that find themselves in a difficult situation – hospitals, orphanages, nursing homes, educational institutions and institutions of science and culture;

charitable organizations;

participation of employees in charitable and sponsorship activities on a voluntary basis.

6. Final provisions

28. The Company is building a management system in the field of Politics, focusing on world standards and the best world experience in this field.

29. The Board of Directors of the Company controls the consistency and effectiveness of the Policy implementation.

30. The solution of social issues is carried out within the limits of the funds provided by the Company's budget for the corresponding financial year.

31. The Company strives to ensure the effectiveness of policy implementation management by introducing strategic management tools in this area - targeted social programs, as well as social investment management mechanisms that optimize the Company's investments and provide a platform for cooperation with a wide range of stakeholders.

32. The Company confirms its readiness to regularly provide information to the Company on the results of implementation of the Policy on the Company's website and/or in the mass media.

33. The target values of key performance indicators are reflected in the Company's Development Program for 2023-2025 for the corresponding period, taking into account the results of the Company's activities for previous period and opportunities for further development of programs and projects in the field of corporate social responsibility.

