



Corporate Code of Conduct

JSC “AK Altynalmas”

JSC “AK Altynalmas”

Almaty, 2019

Table of Contents

1. Introduction	3
2. Terms and definitions	3
3. Purpose	3
4. AA’s mission, vision and values	4
4.1. Mission:	4
4.2. Vision:.....	4
4.3. Values:	4
5. Safety, Health and Environment.....	5
6. Principles	6
6.1. Conflict of interests.....	6
6.2. Gifts and Hospitality	7
6.3. Corruption.....	7
6.4. Laws and Regulations	8
6.5. External Relationships	9
6.6. Confidentiality	11
6.7. Electronic Mail and Internet Usage	11
6.8. Protection and Use of AA assets.....	12
7. AA personnel.....	12
7.1. Fair Treatment and Equal Opportunities	12
7.2. No Harassment.....	12
7.3. Alcohol and Substance Abuse	13
7.4. Smoking.....	13
8. HELP AND ADVICE	13
9. Corporate infringement hotline	14

1. Introduction

1. This Code establishes the core principles, values, and behaviours that govern how JSC “AK Altynalmas” (hereinafter “AA”) and its Employees conduct their business. This Code applies to all those who work in AA and those who work for AA.

2. Terms and definitions

- **AA** - Joint-Stock Company «AK Altynalmas», including all its branches and affiliated structures;
- **Employees** - all personnel of AA whether employed directly by AA, or other staff working for/in AA via an agency or contractor organisation;
- **Public Official** -
 - a) any person (including an official or employee) holding a legislative, administrative or judicial position of any kind in (i) any government, ministry, department, agency, instrumentality or public administration (at any level), or (ii) any public international organisation such as the United Nations or World Bank, or (iii) any company or enterprise wholly or partly controlled or owned by a government;
 - б) any person acting in an official capacity for or on behalf of (i) any government, ministry, department, agency, instrumentality or its part or public administration (at any level), or (ii) any public international organisation or (iii) any political party or political party official or candidate for office; or (ii) any public international organisation or (iii) any political party or political party official or candidate for office;
 - в) any person falling within the definition of (i) persons who hold responsible state positions, (ii) persons who are authorised to perform state functions, (iii) persons equated to those persons who are authorised to perform state functions, or (iv) officials, under the RoK Anti-Corruption Law.

Note:

- 1) Public Officials include members of the Senate, the Mazhilis or a Maslikhat, Akims and employees of state or Akimat departments, and representatives of local communities. A person may be a Public Official under AA policies and procedures even if they are not classified as a Public Official under RoK or other local law.
- 2) "Instrumentality" means an entity controlled by the government that performs a function the government treats as its own. This may be demonstrated if the government appoints senior staff, if it is funded from government funds, it has a monopoly over the function it performs, or it is perceived by the public and government to be performing a government function.

3. Purpose

2. AA is an organisation having a complex structure, where representatives of different ethnic, cultural and religious backgrounds work together. Maintaining and enhancing AA's reputation requires that all of us work and behave to high standards, both in dealing with each other inside Company and with the outside world.
3. Achieving outstanding performance in the long term delivery of our business goals is possible only if we are an organisation where everyone's behaviour conforms to a set of principles of high standard and moral sustainability. Achievement of our goal of becoming a leading company in the Central Asian gold mining industry must be based on high levels of integrity and transparency in our business relationships, with best practice applied in providing safe

and secure working environments, where everyone is given opportunities to develop, and all are treated fairly in a transparent and rewarding environment

4. AA will always seek to play a responsible and constructive role, aligning its business objectives with the aspirations of the communities within which it operates. We respect different cultural and social aspects.
5. We have respect for and manage our impact on the environment and the society in which we work, and we ensure that a consistent and fair approach is applied in our dealings with stakeholders, service providers, and customers.
6. This Code establishes the core principles, values, and behaviours that govern how AA conducts its business. This Code and the other Policies and Procedures referred to in it apply to all those who work for / with AA.
7. All Employees will be given full support from the AA top management in ensuring that we all maintain these behaviours.

4. AA’s mission, vision and values

8. Our mission, vision and values define the corporate culture of AA and they are to be shared by all AA employees for achievement of our strategic purpose and long term aims.
9. Our strategic purpose is to become a leading company in the Central Asian gold mining industry. Kazakhstan is our geographic priority, we perform production and sales of extracted products in a safe, environmentally, and economically sound manner that generates value for the Republic of Kazakhstan, our shareholders, and our employees.
10. Our aim is to continue to be a safe, efficient and profitable company by means of increasing the growth rate of business activities and an improvement of organisational capabilities.
11. Our mission, vision and values:

4.1. Mission:

12. We transform the subsoil potential into GOLDEN opportunities for the society, employees, investors and other stakeholders.

4.2. Vision:

13. Company leadership in the Central Asian gold mining industry. Kazakhstan is our geographic priority.

4.3. Values:

1) OUR PEOPLE

- We value, develop and care for our employees.
- We create equal opportunities for professional development and growth.
- We maintain a friendly working atmosphere.
- We ensure favourable working conditions.
- We seek to become the best employer.

2) CAREFUL ATTITUDE TO THE ENVIRONMENT

- We reasonably use natural resources and seek to minimise any unfavourable impact of our activities upon the environment.
- We identify risks of any potential environmental impact and we manage them.
- We comply with the Environmental Protection requirements.

3) SAFETY

- Safety and health of our employees is our utmost priority.
- We are striving for a “0” (zero) level of injuries and occupational diseases.
- We create safe working conditions and develop a safe behaviour culture.
- We identify and manage industrial safety and occupational health risks.

4) SUSTAINABLE DEVELOPMENT

- In our approach we focus on long-term and sustainable development.
- We seek to implement the best business practices.
- We identify and implement innovative solutions.
- We continuously raise our operational efficiency.
- We invest into human capital as an important sustainable development factor.

5) WE ARE ONE TEAM

- We help each other and undertake responsibility for the team results.
- We share the Company Mission, Vision and Values.
- We rely on our colleagues, value open and fair relationships.
- We work for the team results and we believe that only teamwork is capable of leading us to the set objectives.

6) BEHAVIOUR

- We act with integrity and have consistently high ethical standards.
- We conduct our business in compliance with legal, regulatory and licence requirements applicable to AA and its stakeholders.
- Our relationships are based on fairness, co-operation, loyalty and mutual respect.
- We strive to be open, straightforward, and transparent whilst protecting the business interests of AA.
- We impose high standards of compliance with the laws, policies and procedures on the way we conduct our business.

7) EMPLOYEES

- We treat each other with fairness, respect, and decency.
- We trust, respect, and support each other and the different cultures of our colleagues.
- We work in an open environment and embrace the diversity of people, beliefs, skills, and experience.

8) PARTNERSHIP

- We are focused on maintaining productive, collaborative, and trusting relationships with our shareholders, counterparties and the local communities where we work.
- We work with and seek to provide benefits to the Republic of Kazakhstan, creating comfortable working conditions, enhancing safety in work places, increasing the number of available jobs through the Company growth.

5. Safety, Health and Environment

14. AA takes seriously its responsibilities to conduct its operations with proper regard for the environment and for the safety and health of all those involved in its operations and the public at large and seeks to meet or exceed internationally recognised best practices.

15. AA provides and maintains safe and healthy working conditions, equipment, and work processes for all Employees.
16. AA believes that it is in the best interests of all to protect the safety and health of its Employees.
17. Accordingly, all AA Employees are required to:
 - Comply with AA’s Safety, Health and Environment rules;
 - Comply with the No Smoking Rule;
 - Respect AA’s Fundamental Values as set out in section 4 of this Code;
 - Recognise their personal responsibility for Safety, Health and Environment and to report any issue of concern;
 - Intervene in the case of unsafe acts or conditions;
 - Require other Employees and contractors to act responsibly in compliance with the Safety, Health and Environment principles;
 - Include Safety, Health and Environment in their own and their subordinates’ KPI’s and appraisals;
 - Make prevention of pollution a key consideration in all activities.

6. Principles

18. Every Employee is required to perform his or her duties in accordance with the following principles:

6.1. Conflict of interests

19. We respect the right of Employees to take part in investments, businesses, and other kinds of activities, provided that these are not related to or do not unduly interfere with the business of AA or an Employee’s work in AA.
20. Employees must avoid entering into any situation in which an actual or perceived conflict of interest or any personal interest may arise.
21. Employees should analyse their conduct objectively to ensure that:
 - The interests of AA are paramount when business opportunity and commercial decisions are taken;
 - AA resources are not used to support or benefit personal activities or those of friends and/or relatives;
 - The conduct of AA business will not be influenced, or will not be seen as having been influenced, by friendship or family connections;
 - They are not allowing, or appear to allow, family bonds or a personal relationship to unduly influence decision making or judgment;
 - Confidential aspects of AA’s commercial relationships are not disclosed to a non-AA person; and
 - Gifts or hospitality are not offered or have been received that could or might, or could be seen to, influence a business decision.
22. If in doubt about a possible conflict of interest, Employees should seek guidance in confidence from either the Legal Compliance Counsel or the Compliance Coordination Manager, or alternatively, should speak to their Line Manager.
23. If you are in a situation where a conflict of interest exists, you must inform your Line Manager without delay.

24. Full details of AA’s requirements in relation to any conflict of interest shall be set out in the Conflict of Interest Policy. All Employees are required to read and acknowledge that they will comply with the Conflict of Interest Policy.

6.2. Gifts and Hospitality

25. Gifts and hospitality are practical examples of situations where an actual or perceived conflict of interest may arise.
26. AA prohibits the giving or receipt of a gift, gratuity, or entertainment of more than token or nominal value to or from suppliers or customers or their agents, employees, or fiduciaries.
27. AA maintains registers of gifts/hospitality to ensure that Employees do not give or accept gifts or hospitality that are inappropriate to fostering good business relations or that might appear to place Employees under any obligation.
28. While it is recognised by AA that limited corporate hospitality is given and received as part of building normal business relationships, Employees should avoid giving or accepting hospitality or gifts that might appear to place them under an obligation. Courtesy objects, such as small presents or hospitality gifts, are allowed, only when the value of such objects is small and does not compromise the integrity and reputation of AA and cannot be construed, by an impartial observer, as aimed at obtaining undue advantages.
29. AA has defined a value matrix of different levels of seniority within the Company, recognising that the value of gifts and hospitality may vary according to seniority. This matrix is updated from time to time and published in the Conflict of Interest Policy. Any gifts in excess of the limits must be disclosed to an Employee’s Line Manager and registered in conformity to the above-mentioned Policy procedure.
30. Full details of AA’s requirements in relation to any gifts and hospitality are set out in the Gifts and Hospitality Policy.

6.3. Corruption

31. Any form of corrupt payment or bribe will not be tolerated. Corruption is a criminal offence in Kazakhstan.
32. “Facilitation payments” mean unofficial payments made to public officials in order to secure or expedite the performance of a routine or necessary action. Such payments are sometimes referred to as ‘speed’ or ‘grease’ payments.
33. The payer of the facilitation payment usually already has a legal or other entitlement to the relevant action, but uses the payment to facilitate a faster result from the recipient of the payment.
34. The payment of a facilitation payment is a criminal offence.
35. Bribes, illegitimate favours, collusion, pressures, facilitation payments and requests of personal benefits for oneself or others either direct or through third parties, are prohibited (!).
36. The giving or receiving of any favours, bribes or similar payments of any sort, to or from any Public Official or any other entity doing or seeking to do business with AA is strictly prohibited.
37. Employment of persons connected to a Public Official may be seen as a potential form of corruption.
38. Therefore AA prohibits the following:
- the appointment of a person connected to a Public Official where such appointment could be seen to be promoting AA’s business interests;

- placing an Employee who is a connected person in a position where his/her professional duties conflict with his/her personal relationships.

6.4. Laws and Regulations

6.4.1. Compliance with RoK and International Law

39. Employees must adhere to all relevant RoK and international legislation that applies to AA.
40. The RoK Legislation in respect of these key areas is:
- RoK Criminal Code
 - Art.223 (Article 223. Illegal gathering, divulgence or the use of information which constitutes a commercial or banking secret, tax secret, obtained through horizontal monitoring, a secret related to a microcredit, a secret related to debt collection, as well as any information on legalisation of property);
 - Art.245 (Evasion by a citizen of Tax and (or) Other Mandatory Contributions to the Budget);
 - Art.253 (Commercial bribery);
 - Senior Art. 254 (Dishonest Attitude towards Obligations);
 - Art.366 (Acceptance of a bribe);
 - Art.367 (Giving a bribe);
 - Senior Art. 368 (Mediation in bribery).
 - RoK Administrative Offences Code
 - Senior 676. Art. 676. Providing illegal material remuneration;
 - Senior 677. Getting illegal remuneration by a person authorised to perform state functions, or equivalent to such person; and
 - Senior 678. Providing illegal remuneration by legal entities
41. Key areas that Employees need to ensure they comply with are the RoK laws and interior policies relating to:
- Conflict of interest as highlighted in Section 6.1 above in this Code and in the Conflict of Interest Policy;
 - Split payments, whereby it is not permitted to divide services to be performed or goods to be provided into a number of smaller contracts, in order to avoid contracts approval processes. Further details on these areas are contained in Procurement Policy and corresponding guidelines;
 - Political lobbying and contributions, gifts and payments to Public Officials (including agreements with businesses owned by or controlled by Public Officials). AA does not allow any lobbying or political contributions to be made on its behalf. Further details are set out in Section 6.5 of this Code.
 - Use of political consultants, agents, and advisors are strictly prohibited by AA;
 - Anti-Boycott legislation and international trade restrictions whereby it is not permitted for AA to enter into restricted trade practices in any of its contracts. Further details are set out in the International Trade section 6.4.2 of this Code;
 - Privacy of Information — further details in Section 6.6 of this Code.

6.4.2. International trade

42. In conformity to the Company policies and procedures governing activities of the AA branches, Employees performing tasks where goods or services are purchased and imported from other countries, or where products are sold abroad, need to comply with import and export control laws, foreign currency legislation of RoK.

43. Before entering into any commitments to import or export goods, services, products, software or technology, it is important to seek legal and tax guidance, where appropriate, to understand any controls that apply.
44. It may be that a licence or permit is required or taxes or duty must be paid, before the importation/exportation or before a service can be performed. In addition, for certain commodities, there may be specific requirements in relation to labelling, marking, and documentation. There may also be restrictions on amounts that can be imported.
45. Employees should also be aware of any sanctions or embargoes that may impose restrictions in dealing with companies or contractors, or importing/exporting, from a particular company based out of a particular country.
46. Competition and anti-trust laws apply in many countries, in particular in the United States and Europe, which laws are aimed at preventing any restriction of trade and price fixing. Advice and assistance on these areas should be sought from the AA Legal Department.

6.5. External Relationships

6.5.1. Customers

47. AA’s business relies on developing and maintaining profitable and lasting relationships with customers, offering safety, service, quality and value supported by continuous innovation.
48. AA shall offer and seek quality products and services under competitive conditions, while respecting the rules protecting fair competition.

6.5.2. Contractors

49. In the case of tenders and contracts for the supply of goods and services, and when dealing with contractors, Employees shall:
 - Follow AA Procurement Policy and guidelines concerning selection of and relations with suppliers;
 - Adopt appropriate and objective selection methods, based on established, transparent criteria;
 - Secure the co-operation of suppliers to provide the required quality, cost and delivery time; and
 - Comply with and enforce AA’s obligations and rights under its contracts.

6.5.3. Public Officials

50. AA liaises closely with officials representing the Government and Regulators of the RoK in accordance with the legislation of RoK. Maintaining good relationships with Public Officials is essential to the success of Company.
51. In maintaining these relationships, Employees must act with integrity and impartiality and in accordance with the values and business principles set out in this Code.
52. In dealings with Public Officials, Employees need to be careful if assisting in the provision of visa application assistance, flights, hotel, or other accommodation, entertainment, subsistence allowance, or a car or other vehicle in compliance with the RoK legislation on Bribery and Corruption.
53. It is illegal for Public Officials to receive payments, travel services, or other benefits, unless they are strictly for approved business purposes.
54. Therefore, any Employee that is requested to provide such assistance to Public Officials must notify his/her Line Manager and act in accordance with this Code and the Policy on Efficient Relations with the Regulatory Authorities. Approval for providing such assistance to a Public

Official must be reported to the Compliance Manager or Vice-President for Compliance Control, who will consider the request based on the merits and provided approval. The request must be entered into the Gifts and Hospitality Register.

55. In addition, AA has strict rules governing correspondence with any Public Officials on behalf of AA. Details of these rules shall be set out in the Policy on Efficient Relations with the Regulatory Authorities.

6.5.4. Third Parties

56. When AA operates in conjunction with any third party (consultants, contractors, agents, representatives, officials), it will promote the application of this Code and the Procurement Policy and corresponding guidelines at all times. Employees and all other representatives of shall ensure that:

- This Code is brought to the attention of every person or body having business relations with AA;
- Code principles and procedures are followed;
- Only qualified people and reputable persons, companies and organisations are selected and engaged in third party relationships;
- All information relevant to the selection of a third party supplier or contractor must be properly taken into account to decide the compliance risks associated with such a party; and
- Perceived and actual violations of the Code by third parties are immediately reported to the Employee's Line Manager, Vice-President for Compliance Control, or Compliance Control Manager.
- Any remuneration paid to any third party, shall be entirely in accordance with the specific contract and/or agreement entered into with AA.
- No undeclared offers or payments involving third parties, will be accepted, solicited or offered by Employees and/or representatives of AA.

6.5.5. External Communications and the Media

57. All external communications must comply with the Company interests and principles of this Code. Information provided to outside parties shall be truthful and transparent. In its communications with the media, information shall be presented in an accurate and uniform way. Employees may not give information to media representatives nor engage in providing any such information, without involvement of the employee charged with the function of maintaining communications with media.
58. Employees, whose job duties include participation in meetings, workshops and other public events for provision of any information on AA or disclosure of such information in media, shall be authorised by their line manager, while all texts, speeches or action plans that they intend to publish shall be approved by an employee that is in charge of media relations.

6.5.6. Donations

59. From time to time, AA or an Employee may be requested to make a financial donation, or provide a facility or piece of equipment, to a third party. Such requests should be made in writing by the third party, and forwarded by the Employee to his/her Line Manager, who will submit it for consideration by the Leadership Team of AA.
60. Additionally, if an Employee wishes to arrange for a collection to be made within AA to raise money for a charitable cause, such a request must be made in writing by the Employee, and forwarded to his/her manager for consideration by the Management Team.

6.6. Confidentiality

61. Clear and effective communication plays a vital role in sustaining relationships and safeguarding public confidence in AA. Effective internal communication is vital.
62. Openness and transparency of operations, appropriate to the expectations of respective audiences, are key business goals, but subject to the demands of commercial confidentiality.
63. Safeguarding confidential information is essential to the conduct of AA’s business.
64. Employees are likely, during the course of their work, to become aware of confidential information (that is, information not available to the public) concerning the affairs and business transactions of AA, its present and prospective customers, its suppliers, its shareholders, and other Employees.
65. AA trade secrets, proprietary information, and its internal information are valuable assets. Protection of this information is an obligation of every Employee, even after leaving the company.
66. AA’s trade and industrial secrets may consist of any formula, design, device, or information that is used in our business and gives AA an opportunity to obtain a competitive advantage.
67. Caution and discretion are required in the use of confidential information, further details shall be set out in the Data Confidentiality Policy.
68. All Employees are required to:
 - Obtain and handle only data that is necessary and adequate to their work and strictly related to the tasks being performed;
 - Obtain and handle such data only within the specified procedures;
 - Store data in a way that avoids non-authorised persons having unsanctioned access to it;
 - Disclose such data only pursuant to specific procedures and/or subject to specific authorisation by Line Managers and, in any case, only after having checked that such data is available for disclosure;
 - Ensure that no relative or absolute constraint exists on the disclosure of information concerning third parties connected to AA, by any kind of relationship and, whenever necessary, ensure that their consent is obtained;
 - File data in such a way that any person authorised to access, may do so with as much precision, clarity and truthfulness as possible.
69. AA and its Employees have an obligation to ensure that any personal data of Employees is protected as confidential.

6.7. Electronic Mail and Internet Usage

70. It is the responsibility of all Employees to ensure that the AA’s IT systems and other technical resources are used appropriately and in compliance with the terms of this Code and the Info Resources Use Provision. AA provides electronic mail to facilitate communication among its Employees and external business partners. AA has Internet services to support the advancement of AA’s business goals and objectives.
71. Company encourages use of the Internet as a strategic business and learning tool. The Internet can be used to communicate and exchange information, as long as usage complies with all applicable laws and regulations.
72. AA requirements in relation to the use of electronic mail and the internet are set out in the Info Resources Use Provision. Every Employee is required to read and acknowledge that he/she will comply with the above-mentioned Provision.

6.8. Protection and Use of AA assets

73. AA property is provided to Employees for business use. Any use for non-business reasons should be limited and without undue interruption of the Employee's daily duties.
74. Employees may use company telephones, computers, and the email and internet system for personal purposes, but such use will be subject to the purpose being morally acceptable and without such use preventing the Employee from being fully functional in the execution of his or her duties.
75. Employees shall at all times use the assets of AA with the necessary care and in due consideration of other Employees.

7. AA personnel

76. The loyalty and professionalism of AA Employees is a fundamental component necessary for AA to realise its strategic goals and objectives. Employees are the main value of AA.
77. AA top management shall:
 - Recruit, train, promote and compensate Employees on merit, based on performance and the skills, relevant qualifications, experience, aptitude and ability they bring to the job, and without discrimination or favouritism of any kind;
 - Adopt criteria of merit, ability and professionalism in all decisions concerning AA Employees;
 - Develop the abilities and skills of each Employee such that they may realise their full potential;
 - Create a working environment where personal characteristics do not give rise to discrimination or favouritism;
 - Objectively assess and evaluate the work of subordinates in accordance with his or her job duties.

7.1. Fair Treatment and Equal Opportunities

78. The Company expects all its Employees, at every level, to cooperate in maintaining a climate of reciprocal respect for each other's' dignity, honour, and reputation.
79. AA supports the protection of human rights within its sphere of influence. AA shall do its best to prevent the emergence of attitudes that can be considered offensive.
80. Equal opportunities are given to all Employees, whereby everyone is treated fairly and without discrimination of any kind.
81. All Employees are required to comply with this requirement.
82. Any Employee that feels it may have been discriminated against should speak to its Line Manager, the Human Resources Administration Manager, the Vice President for Compliance Control and/or the Compliance Control Manager.
83. All such complaints will be treated as confidential and, where the circumstances merit, will be investigated through internal investigation.
84. Disciplinary action will be taken, where necessary in accordance with the executed employment agreements and the current law of the Republic of Kazakhstan.

7.2. No Harassment

85. There is no place in AA for harassment in personal relationships, either inside or outside the company. No form of harassment or victimisation will be condoned.

86. AA defines harassment as:

- The creation of an intimidating, hostile or isolating environment or atmosphere for one or more Employees;
- Any prejudicial treatment whether it be racial, ethnic, religious, skin colour, nationality, or of any other form;
- Unjustified interference in the work performed by others;
- The placing of obstacles in the way of the work prospects and expectations of others, merely for reasons of personal prejudices;
- The perception of any individual that they are under any pressure to respond to sexual attention;
- Proposals of private interpersonal relations, which are repeated despite the recipient's clear rejection.

87. Employees must not harass anyone and must be sensitive to the fact that others may perceive your behaviour as harassment, even if it is not intended that way.

88. Any Employee that feels it may have been subject to harassment or suspects that harassment is occurring to someone else, should talk to its Line Manager, the Human Resources Administration Manager, the Vice President for Compliance Control and/or the Compliance Control Manager.

89. All such complaints will be treated as serious and, where required, will be investigated in accordance with the compliance procedures. Disciplinary action will be taken, where necessary in accordance with the executed employment agreements and the current law of the Republic of Kazakhstan.

7.3. Alcohol and Substance Abuse

90. AA demands that each Employee contributes to maintaining a good work environment. Being under the influence of alcohol or drugs, whilst in a work place, is dangerous and unacceptable.

91. Individuals who work under the effect of alcohol or drug abuse, or make use of or give to others any drug or similar substance in the workplace, are a serious threat to themselves and others.

92. Should an Employee found to be at work whilst impaired by alcohol or drugs, such impairment will be regarded as having committed a serious act of misconduct and disciplinary action will follow in accordance with the executed employment agreements and the current law of the Republic of Kazakhstan.

7.4. Smoking

93. Smoking is forbidden in or close proximity of any AA premises or the entrances of buildings, work sites, living accommodation or recreation areas, except in designated smoking areas.

8. HELP AND ADVICE

94. The Vice President for Compliance Control has been appointed as the Guarantor of this Code of Conduct, with overall responsibility for the implementation of the Code and dealing with any issues raised by Employees.

95. This Code will be subject to periodic review by the Compliance Control Manager, acting as Custodian of the Code of Conduct.

96. If any Employee has any specific queries about the Code or issues relating to its implementation or wishes to report actual or potential infringements of the Code, he/she should contact his/her Line Manager.

97. If he/she prefers not to discuss the issue with the Line Manager (or having discussed with the Line Manager is still not sure what to do) then the Employee should contact either the Vice President for Compliance Control and/or the Compliance Control Manager. All contacts will be treated in confidence.
98. Allegations of infringements of key obligations under this Code will be dealt with confidentially and, where the circumstances merit, will be investigated in accordance with the compliance procedures.
99. Disciplinary action will be taken, where necessary in accordance with the executed employment agreements and the current law of the Republic of Kazakhstan.

9. Corporate infringement hotline

100. AA has established a Compliance Hotline to provide Employees with an anonymous reporting method in the event they are uncomfortable reporting instances of alleged violations of the Code of Conduct to their Line Manager or to the Compliance Control. Instructions for using the Hotline are posted in all work places.