

# KASE CLEARING CENTRE JSC

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**Approved**

by a decision of the Board of Directors of  
KASE Clearing Centre JSC

(minutes No. 13 of the meeting  
dated June 21, 2024)

**Effective**

as of June 21, 2024

## ANTI-CORRUPTION POLICY

## LIST OF AMENDMENTS

### 1. Changes and additions No. 1:

- approved by the decision of the Board of Directors of KASE Clearing Centre JSC (minutes No. 24 of the meeting dated December 26, 2025);
- effective as of January 5, 2026.

This Policy has been developed in accordance with the law of the Republic of Kazakhstan "On Anti-Corruption" (hereinafter – the Law), other legislative acts of the Republic of Kazakhstan and international standards in the field of anti-corruption, the Compliance-risks management policy of KASE Clearing Centre JSC, as well as internal documents of KASE Clearing Centre JSC (hereinafter – the Clearing Centre).

**Article 1. General provisions**

1. This Policy is an internal document of the Clearing Centre that establishes goals, tasks and main principles in the field of combating corruption at the Clearing Centre, aimed at preventing, identifying, suppressing and minimizing the consequences of corruption at the Clearing Centre.
2. The anti-corruption system is an integral part of the Clearing Centre's compliance-risks management system.
3. The concepts and designations used in this Policy are used in the meanings in which they are used in the legislation of the Republic of Kazakhstan and internal documents of the Clearing Centre.
4. The following terms and definitions are used in this Policy:
  - 1) **anti-corruption policy** – legal, administrative and organizational measures aimed at reducing corruption risks, increasing public confidence in activities of government bodies, and other measures in accordance with the Law;
  - 2) **anti-corruption restrictions** – restrictions established by the Law and aimed at preventing corruption offences;
  - 3) **corruption** – illegal use by an employee of the Clearing Centre of his work-related (official) powers and related opportunities in order to obtain or extract personally or through intermediaries material (non-material) benefits and advantages for himself or third parties, as well as bribery of these persons by providing benefits and advantages;
  - 4) **corruption offense** – an unlawful guilty act (action or inaction) that has signs of corruption, for which administrative or criminal liability is established by the legislation of the Republic of Kazakhstan;
  - 5) **corruption risk** – the likelihood of the occurrence of causes and conditions conducive to the commission of corruption offenses;
  - 6) **conflict of interest** – a contradiction between the personal interests of the Clearing Centre's employees and their official powers, in which the personal interests of these persons may lead to their failure to perform and/or improper performance of their official duties;
  - 7) **anti-corruption** – activities of the Clearing Centre's employees within their powers to prevent corruption, including the formation of an anti-corruption culture, identifying and eliminating the causes and conditions facilitating the committing of corruption offenses, as well as identifying, suppressing, disclosing and investigating corruption offenses and eliminating their consequences;
  - 8) **prevention of corruption** – activities of the Clearing Centre's employees to study, identify, limit and eliminate the causes and conditions facilitating the committing of corruption offenses through the development and implementation of a system of preventive measures;
  - 9) **gift** – goods, jobs, services, money or any other material benefits provided (transferred) free of charge to an employee/executive of the Clearing Centre and/or his spouse/close relative (including transfer of property rights, release from duties, refusal of any – rights in favor of an employee/executive of the Clearing Centre or his affiliates, provision of discounts, loans, payment for entertainment, recreation, travel expenses, etc.) for actions (inaction) in favor

of the client/counterparty or other person who provided them, if such actions are within the official (functional) powers of the employee/official or he, by virtue of his official position, can contribute to such actions (inaction);

- 10) **authorized anti-corruption body** – a state body that carries out the formation and implementation of the anti-corruption policy of the Republic of Kazakhstan and coordination in the field of anti-corruption, as well as the prevention, detection, suppression, disclosure and investigation of corruption offenses, and its territorial divisions;
  - 11) **economic entity** – a legal or an individual carrying out economic activities on its own behalf;
  - 12) **register of unconscientious participants in public procurement** – a list of potential suppliers, formed in accordance with the law of the Republic of Kazakhstan "On public procurement";
  - 13) **register of unconscientious procurement participants** – a list of potential suppliers formed in accordance with the law of the Republic of Kazakhstan "On procurement of individual entities of the quasi-public sector";
  - 14) **official** – an employee of the Clearing Centre, permanently, temporarily or by special authority performing organizational, administrative or administrative functions at the Clearing Centre, as well as a person authorized to make decisions on organizing and conducting procurement, holding a position not lower than the head of an independent structural unit: Chairman and members of the Management Board, financial director, managing director, chief accountant, head of the procurement unit, which are determined for the purposes of this Policy;
  - 15) **counterparties** mean all individuals and legal entities who have entered into civil contracts with the Clearing Centre.
5. This Policy is subject to mandatory application and compliance by all officials and other employees of the Clearing Centre.
  6. The provisions of this Policy may extend to other legal entities and individuals with whom the Clearing Centre enters into contractual relations, and such conditions must be set out in the agreements concluded by the Clearing Centre with them.

**Article 2. Goals, tasks and main principles of anti-corruption**

1. The main goals of anti-corruption are precaution, detection, prevention and minimization of cases of corruption at the Clearing Centre.
2. Achieving anti-corruption goals is achieved by solving the following tasks:
  - 1) creation and implementation of mechanisms for implementing the main principles of anti-corruption;
  - 2) developing intolerance towards corruption among employees of the Clearing Centre;
  - 3) minimizing the risks of involvement of the Clearing Centre and its employees in corruption activities;
  - 4) ensuring effective monitoring of the implementation of anti-corruption measures;
  - 5) ensuring compliance by employees of the Clearing Centre with the requirements of the anti-corruption legislation of the Republic of Kazakhstan and this Policy.
3. Anti-corruption efforts at the Clearing Centre are carried out on the basis of the following principles:

- 1) **legality** – anti-corruption measures at the Clearing Centre are implemented in strict accordance with the anti-corruption legislation of the Republic of Kazakhstan using the best international practices in this area;
- 2) **non-acceptance of corruption in any forms and manifestations** – officials and other employees of the Clearing Centre are prohibited from directly or indirectly, personally or through any intermediary, participating in any corrupt practices;
- 3) **employee involvement** – the Clearing Centre encourages all its employees and other interested parties to report their suspicions about possible violations and cases of non-compliance with the requirements of this Policy, as well as propose measures to improve the system for preventing and combating corruption;
- 4) **preventing conflicts of interest** – each employee of the Clearing Centre, when performing his official duties, must put the interests of the Clearing Centre above his personal interests and prevent the occurrence of situations that are or may be regarded as a conflict of interest;
- 5) **the inevitability of punishment** – the Clearing Centre declares the inevitability of punishment for committing corruption offenses in the performance of their official duties, regardless of the position held, length of service and other conditions;
- 6) **due diligence** – the Clearing Centre observes due diligence in relation to its clients/counterparties and candidates for a vacant position before making a decision to begin or continue business/employment relations to ensure their reliability and the absence of a conflict of interest.

**Article 3. Types of corruption offenses, factors of their occurrence and measures to combat corruption**

1. Types of corruption offenses for which liability is provided in accordance with the legislation of the Republic of Kazakhstan are as follows:
  - 1) receiving and giving bribes and/or illegal material reward, mediation in bribery;
  - 2) abuse and excess of official powers;
  - 3) inaction on duty and negligence;
  - 4) illegal participation in business activities;
  - 5) official forgery;
  - 6) commercial bribery for the purpose of obtaining benefits and advantages for oneself or other individuals and legal entities or causing harm to other individuals and legal entities;
  - 7) receipt of other material (non-material) benefits and advantages in accordance with anti-corruption legislation.
2. The main factors influencing the occurrence of corruption at the Clearing Centre are:
  - 1) ineffective organizational structure and personnel policies;
  - 2) poor corporate culture among employees;
  - 3) low-quality internal documents and their inconsistency with the legislation of the Republic of Kazakhstan on combating corruption;
  - 4) non-transparency of the services provided, procurement processes and sale of the Clearing Centre's property;

- 5) ineffectiveness of the internal control system;
  - 6) low level of communication with/between employees.
3. The following anti-corruption measures are applied at the Clearing Centre:
- 1) anti-corruption monitoring;
  - 2) internal analysis of corruption risks;
  - 3) formation of an anti-corruption culture;
  - 4) identification of corruption-related norms in internal documents of the Clearing Centre;
  - 5) establishing anti-corruption restrictions for officials;
  - 6) prevention and resolution of conflicts of interest;
  - 7) measures to suppress, disclose corruption offenses and eliminate their consequences;
  - 8) submitting regular reports to the Board of Directors and the authorized body on anti-corruption issues;
  - 9) carrying out comprehensive verification and assessment of the reliability of counterparties;
  - 10) inclusion of anti-corruption clauses in standard contracts of the Clearing Centre in order to prevent the commission of corrupt acts during their execution;
  - 11) other measures not prohibited by the legislation of the Republic of Kazakhstan.

**Article 4. Anti-corruption standards**

1. Anti-corruption standards – a system of recommendations established for the activities of the Clearing Centre, aimed at preventing corruption.
2. Anti-corruption standards determine the actions and decisions of the Clearing Centre's employees aimed at strict compliance with established rules and prevention of corruption, in accordance with Appendix 1 to this Policy.

**Article 5. Anti-corruption restrictions**

1. In order to prevent the commission of actions that may lead to the use of their powers in personal, group and other non-official interests, officials undertake anti-corruption restrictions on:
  - 1) carrying out activities incompatible with the performance of official powers;
  - 2) the inadmissibility of joint service (work) of close relatives, spouses and in-laws;
  - 3) use of confidential and other information not subject to official dissemination in order to obtain or extract material and non-material benefits and advantages;
  - 4) accepting material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions are within the official powers of the persons, or these persons, by virtue of their official position, can facilitate such actions (inaction);
  - 5) opening and owning accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, storing cash and valuables in foreign banks located outside the Republic of Kazakhstan;

- 6) participation in gambling and (or) betting in gambling establishments that fall under the definition provided for by the Law of the Republic of Kazakhstan "On Gambling Business", as well as participation in gambling and (or) betting in places not designated for this purpose or in gambling and (or) betting conducted through the use of telecommunications networks, including the Internet (*this sub-item was included by the decision of the Board of Directors of the Clearing Centre dated December 26, 2025*).
2. Officials must not:
    - 1) independently participate in the management of an economic entity, if management or participation in the management of an economic entity is not included in their official responsibilities in accordance with the laws of the Republic of Kazakhstan, contribute to the satisfaction of the material interests of organizations or individuals through the unlawful use of their official powers in order to obtain property or other goods;
    - 2) engage in entrepreneurial activity, with the exception of:
      - acquisition and/or sale of units of open-end and interval unit investment trusts, bonds in the organized securities market, shares of commercial organizations (common shares in an amount not exceeding five percent of the total number of voting shares of organizations) in the organized securities market, except for cases stipulated by the internal documents of the Clearing Centre (*this paragraph was changed by the decision of the Board of Directors of the Clearing Centre dated December 26, 2025*);
      - leasing (renting) of housing owned by them and receiving income from such leasing;
    - 3) engage in other paid activities, except for teaching, scientific and other creative activities;
    - 4) hold positions directly subordinate to positions occupied by their close relatives, spouse and/or relatives, and also have close relatives, spouse and/or relatives directly subordinate to them;
    - 5) hold positions with their close relatives, spouse and/or relatives in the same management body (board of directors, supervisory board, executive body) of the Clearing Centre or other entity of the quasi-public sector;
    - 6) carry out official duties if there is a conflict of interest.
  3. Officials, within 30 calendar days from the date of taking office, are obliged to transfer into trust management for the duration of the performance of these functions in the manner established by the laws of the Republic of Kazakhstan, property belonging to them, the use of which entails the receipt of income, with the exception of money, bonds, units of open-ended and interval unit investment trusts legally owned by them, as well as property transferred for property lease.
  4. Officials have the right to hold paid positions in the management bodies and executive bodies of subsidiaries, dependent and affiliated legal entities of the Clearing Centre.
  5. Failure to fulfill obligations by officials is grounds for their termination of their powers.
  6. The consent of officials to adopt anti-corruption restrictions is formalized by the HR department upon hiring and/or appointment to an executive position by signing statements in accordance with Appendix 2 to this Policy, which are stored in the personal files of officials.
  7. Officials and other employees of the Clearing Centre, in the event of a conflict of interest or in the event of the possibility of its occurrence, are obliged to notify their superior and the compliance department in the manner prescribed by the internal

document of the Clearing Centre regulating issues of managing conflicts of interest.

**Article 6. Receiving and giving gifts**

1. Under no circumstances should the receipt/giving of a gift by an official or other employee of the Clearing Centre constitute a hidden reward that could have a negative impact on the reputation of officials and other employees of the Clearing Centre.
2. Officials and other employees of the Clearing Centre are prohibited from:
  - 1) accepting gifts for themselves, their spouse, a close relative, transferred by the Clearing Centre's counterparty, other third parties in connection with such employee's performance of any actions (inaction) related to his official and functional responsibilities at the Clearing Centre;
  - 2) accepting/giving gifts on behalf of the Clearing Centre and its employees to third parties in the form of money, regardless of the form (cash/non-cash) and type of currency;
  - 3) ask or enforce to the giving of gifts.
3. Officials and other employees of the Clearing Centre have the right, subject to the restrictions provided for in this article, to accept/give business gifts (of an advertising, image nature):
  - 1) related to conducting seminars, presentations and other business/corporate events;
  - 2) intended for presentation, such as greeting cards, honorary badges, certificates from the Clearing Centre or other legal entity;
  - 3) awards, prizes received for participation in events held by the Clearing Centre, as well as for achievements in the Clearing Centre market.
4. Any gifts must be rejected/returned to the donor in an ethical manner if they do not meet the criteria specified in item 3 of this article.
5. Gifts received without the knowledge of officials and/or members of their families, as well as received by them in violation of the requirements of this article, are subject to gratuitous transfer to the authorized body for the management of state property within seven calendar days from the date of receipt of the gift or from the day when the official the person became aware of the receipt of the gift, and services provided to these persons under the same circumstances must be paid for by transferring money to the republican budget within seven calendar days from the date of provision of the service or from the day when the official became aware of the provision of the service.
6. Employees of the Clearing Centre are required to inform the compliance department about the facts of receiving gifts within two business days from the date of their receipt.
7. The Clearing Centre prohibits the payment or acceptance of facilitation payments made to officials and employees to perform or expedite routine procedures, the amounts of which differ from official fees for services.
8. The Clearing Centre does not finance political parties, public associations, and also does not participate in charity and sponsorship projects in order to obtain or maintain an advantage for the implementation of its activities.

**Article 7. Procurement of goods, jobs and services**

When purchasing goods, jobs and services, it is necessary to:

- 1) optimally and efficiently spend the money used for procurement;
- 2) provide potential counterparties with equal opportunities to participate in the procurement procedure;
- 3) maintain fair competition among potential counterparties;
- 4) promote openness and transparency of the procurement process;
- 5) prevent corruption;
- 6) not to allow close relatives, spouses or relatives (relatives of spouses) of employees of the Clearing Centre who have the right to make decisions on choosing a counterparty or who are initiators or organizers of ongoing procurements to participate in ongoing procurements as potential counterparties;
- 7) not to allow the participation of a potential counterparty and/or a subcontractor (co-contractor) attracted by it, who have unfulfilled obligations under executive documents and are included in the Register of Unscrupulous Participants in Public Procurement and/or the Register of Unscrupulous Participants in Procurements, formed on the basis of court decisions that have entered into legal force, and based on the decision of the authorized body to recognize potential suppliers as unscrupulous participants in public procurement / procurement and posted on the Internet resources <https://goszakup.gov.kz>, <https://eep.mitwork.kz/ru>.

**Article 8. Selection, placement of personnel and personnel management**

When selecting, placing personnel and managing personnel, heads of structural divisions should:

- 1) prevent cases of selection and placement of personnel on the basis of kinship, community and personal loyalty, ensure compliance with the principles of meritocracy;
- 2) comply with the requirements of the labor legislation of the Republic of Kazakhstan;
- 3) when hiring at the Clearing Centre, explain the main responsibilities, prohibitions and restrictions imposed on the employee;
- 4) prevent the unjustified transfer of information about employees' personal data;
- 5) not demand or contact officials appointed to positions with a request to provide any services of a personal nature;
- 6) specifically and clearly define the tasks and scope of official powers of employees;
- 7) distribute responsibilities evenly among employees;
- 8) not give orders that contradict the legislation of the Republic of Kazakhstan;
- 9) not use official position to influence the activities of subordinates when resolving personal issues;
- 10) not force subordinates to commit corruption offenses;
- 11) take timely and comprehensive measures to resolve conflicts of interest that arise among employees of the same department in the course of performing their official duties;
- 12) take comprehensive measures to prevent corruption;
- 13) eliminate the causes and conditions conducive to the commission of corruption offenses, including with subordinates;
- 14) not participate in gambling games of monetary or other property nature with a superior or subordinate person, or a person who is otherwise dependent on him at work.

**Article 9. Application of anti-corruption measures**

1. The Clearing Centre takes measures to prevent and combat corruption in accordance with the norms of the anti-corruption legislation of the Republic of Kazakhstan using international standards.
2. Anti-corruption monitoring carried out at the Clearing Centre is thematic and is carried out for the purpose of assessing law enforcement practice in the field of anti-corruption by collecting, processing, summarizing, analyzing and evaluating information regarding anti-corruption policy, the status and analysis of information regarding the effectiveness of measures taken by the Clearing Centre on anti-corruption.
3. Anti-corruption monitoring is carried out by the compliance department on a quarterly basis by studying publications in the media, reports of the Internal Audit Service, complaints (appeals) of individuals and legal entities, and the availability/absence of potential conflicts of interest among employees of the Clearing Centre. Results of anti-corruption monitoring are included by the compliance department in the compliance risk management report on a quarterly basis and may form the basis for conducting an internal analysis of corruption risks.
4. Internal analysis of corruption risks (hereinafter – the Analysis) is carried out based on the results of anti-corruption monitoring in order to identify and study the reasons contributing to the commission of corruption offenses. The analysis is carried out by the compliance department at least once a year in the manner prescribed by the Clearing Centre's internal document, which determines the procedure for implementing measures aimed at combating corruption.
5. For the purpose of precaution, prevention or detection of corruption offenses, employees and counterparties of the Clearing Centre, as well as other third parties may inform the Clearing Centre through any of the following communication channels that ensure confidentiality:
  - 1) e-mail address: [anticorruption@kase.kz](mailto:anticorruption@kase.kz), [compliance@kase.kz](mailto:compliance@kase.kz);
  - 2) helpline: +7 (727) 237 53 00;
  - 3) postal address: 280 Baizakov St., North Tower of the multifunctional complex "Almaty Towers", room 502, city of Almaty A15G7M6, Republic of Kazakhstan.
6. In order to develop an anti-corruption culture among employees, the compliance department is implementing a program for training and educating employees on anti-corruption issues in accordance with the Action Plan of the compliance department (*this item was changed by the decision of the Board of Directors of the Clearing Centre dated December 26, 2025*).

**Article 10. Activities to combat corruption and create an anti-corruption culture**

1. The main areas of the Clearing Centre's anti-corruption activities are:
  - 1) implementing a unified policy of the Clearing Centre in the field of anti-corruption and creating a negative attitude towards corrupt behavior at the Clearing Centre;
  - 2) appointing divisions or authorized persons of the Clearing Centre responsible for the prevention of corruption and other offenses;
  - 3) regular assessment of corruption risks in order to identify areas of the Clearing Centre's activities most exposed to such risks, development of appropriate anti-corruption measures;
  - 4) identification and resolution of conflicts of interest at the Clearing Centre;

- 5) training, informing and consulting employees of the Clearing Centre on issues of preventing and combating corruption (familiarization with the legislation of the Republic of Kazakhstan and internal documents of the Clearing Centre governing issues of preventing and combating corruption, conducting training events, organizing individual consulting for employees of the Clearing Centre);
  - 6) implementation of measures to prevent corruption when interacting with counterparties;
  - 7) internal control (ensuring compliance of the internal control system with the provisions of anti-corruption standards, regular monitoring of compliance with internal procedures and standards, accounting data, the availability and reliability of primary accounting documents, the economic justification of expenses in areas with a high corruption risk, preventing the preparation of unofficial reports and the use of forged documents, improving the procedure for the use of property and resources of the Clearing Centre) and audit (*this sub-item was changed by the decision of the Board of Directors of the Clearing Centre dated December 26, 2025*);
  - 8) unification of rights and restrictions, prohibitions and obligations established for employees of the Clearing Centre;
  - 9) interaction of the Clearing Centre on anti-corruption issues with government bodies, organizations and citizens.
2. Creating an atmosphere of intolerance towards corruption – activities to strengthen the Clearing Centre's employees' belief in the need to combat corruption through the prism of a system of values generally recognized in society.
  3. The Clearing Centre's anti-corruption culture is formed through a set of general educational, informational and organizational measures, including:
    - 1) training on anti-corruption issues;
    - 2) viewing and discussion of thematic video materials;
    - 3) organizing meetings with representatives of government bodies and public associations with the subsequent development of measures to combat corruption;
    - 4) development and implementation of internal documents;
    - 5) carrying out explanatory and other events.

**Article 11. Responsibility of officials for organizing work aimed at combating and preventing corruption**

1. The Clearing Centre and its officials implement anti-corruption measures within their competence in accordance with the Law.
2. The effectiveness of measures aimed at combating and preventing corruption is supported by the principled position of the Clearing Centre's management, which is characterized by consistency, systematicity and continuity of action.

**Article 12. Final provisions**

1. Responsibility for fulfilling the requirements of this Policy rests with all employees.
2. The contents of this Policy must be brought to the attention of each employee of the Clearing Centre by the HR department upon hiring, as well as in the event of changes and/or additions to this Policy – to all employees of the Clearing Centre.
3. Issues not regulated by this Policy are resolved in accordance with the legislation of the Republic of Kazakhstan, the charter of the Clearing Centre, its internal documents, as well as decisions of bodies and officials adopted in the prescribed manner, within their competence.
4. This Policy is subject to publication on the Clearing Centre's Internet resource.
5. This Policy is subject to review for the need for updating at least once every three years, calculated from the date of entry into force of this Policy, and in the case of its updating – from the date of entry into force of the latest changes and/or additions.

**Chairperson of the Management Board**

**N. Khoroshevskaya**

**ANTI-CORRUPTION STANDARDS**  
**of KASE Clearing Centre JSC**

1. Anti-corruption standards for employees of KASE Clearing Centre JSC (hereinafter – the Clearing Centre) were developed in accordance with item 2 of Article 10 of the Law of the Republic of Kazakhstan "On Combating Corruption" in order to establish a system of recommendations aimed at preventing corruption at the Clearing Centre.
2. Anti-corruption standards are aimed at achieving an atmosphere of intolerance towards any manifestations of corruption at the Clearing Centre by creating a system of value and moral anti-corruption behavior guidelines for employees of the Clearing Centre when performing their official functions.
3. Name of the sphere of public relations: **finance, including clearing and banking activities.**
4. The principles of anti-corruption standards are:
  - 1) legality;
  - 2) transparency;
  - 3) ethics;
  - 4) respect for the rights and legitimate interests of individuals and legal entities and their protection from corruption;
  - 5) avoidance of conflicts of interest.
5. Anti-corruption standards define the following norms of behavior for employees of the Clearing Centre:
  - 1) be guided by the principle of legality, the requirements of the Constitution of the Republic of Kazakhstan, laws and other regulatory legal acts of the Republic of Kazakhstan, strictly comply with anti-corruption legislation;
  - 2) ensure compliance and protection of the rights, freedoms and legitimate interests of individuals and legal entities;
  - 3) not allow oneself to commit actions that could discredit the Clearing Centre;
  - 4) report to the immediate or direct manager about the occurrence of a conflict of interest, personal interest in the performance of official duties, inclination to corrupt behavior and receiving gifts;
  - 5) not be guided by personal and/or selfish interests when performing their official duties;
  - 6) refrain from making unlawful requests to colleagues and managers that violate the established order of relationships, which may influence their adoption of an impartial official decision;
  - 7) not to induce other employees to commit corruption offenses and not to encourage such actions;
  - 8) not to accept gifts in connection with the performance of official duties;
  - 9) not to use confidential and other information that is not subject to dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
  - 10) refuse appointment to a position if it is associated with direct subordination or control to persons in close family and family relationships (parents, spouses, brothers, sisters, children, relatives (brothers, sisters, parents and children of the spouse));
  - 11) be active in combating corruption and uncovering corruption offenses;

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- 12) immediately inform the direct or immediate supervisor in writing about doubts about the legality of the order received for execution;
  - 13) contact higher management if the immediate manager is himself involved in a conflict of interest;
  - 14) support and demand from colleagues compliance with a high legal anti-corruption culture;
  - 15) not use the means of material, technical, financial and information support, as well as other property of the Clearing Centre for non-official purposes;
  - 16) notify the division implementing the anti-corruption policy of the Clearing Centre and the division implementing the personnel management policy of the Clearing Centre of intention or actual participation in business activities.
6. Managers at all levels in relations with subordinates must:
- 1) be an example of impartiality, fairness, selflessness, and respect for the honor and dignity of the individual through their behavior;
  - 2) promote the establishment and strengthening of businesslike and friendly relationships and constructive cooperation within their department;
  - 3) be objective when evaluating the performance of their subordinates and applying incentives and penalties;
  - 4) avoid unfounded accusations, rudeness, humiliation, tactlessness, or inappropriate behavior toward colleagues;
  - 5) not impose their religious beliefs on colleagues or coerce subordinates to participate in the activities of public and religious associations or other non-profit organizations;
  - 6) not coerce subordinates to commit corruption or other offenses;
  - 7) prevent or take other measures to prevent violations of professional ethics standards by other employees;
  - 8) take timely and comprehensive measures to resolve any conflicts of interest that arise for subordinate employees in the course of performing their official duties;
  - 9) eliminate the causes and conditions that contribute to the commission of corruption offenses by subordinates;
  - 10) take measures aimed at creating a favorable moral and psychological atmosphere that excludes any forms of discrimination and attacks on the honor and dignity of employees..
7. Managers at all levels ensure compliance with Anti-Corruption standards and organize anti-corruption work among employees subordinate to them.

**STATEMENT**  
**on the adoption of anti-corruption restrictions**

I, \_\_\_\_\_,  
(Full name)

\_\_\_\_\_  
(job title)

in order to comply with the requirements of the anti-corruption legislation of the Republic of Kazakhstan, internal documents of KASE Clearing Centre JSC in the field of anti-corruption, preventing actions that may lead to the use of my official powers in personal, group and other non-official interests, I accept anti-corruption restrictions on:

- 1) carrying out activities incompatible with the performance of my functions;
- 2) the inadmissibility of joint work of persons with close relatives, spouses and in-laws;
- 3) the use of information not subject to official dissemination for the purpose of obtaining or extracting property and non-property benefits and advantages;
- 4) accepting gifts in connection with the performance of official powers in accordance with the legislation of the Republic of Kazakhstan;
- 5) opening and owning accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, storing cash and valuables in foreign banks located outside the Republic of Kazakhstan;
- 6) participation in gambling and (or) betting in gambling establishments that fall under the definition provided for by the Law of the Republic of Kazakhstan "On Gambling Business", as well as participation in gambling and (or) betting in places not designated for this purpose or in gambling and (or) betting conducted through the use of telecommunications networks, including the Internet *(this subitem was included by the decision of the Board of Directors of the Clearing Centre dated December 26, 2025)*.

\_\_\_\_\_  
(last name, first name and patronymic, signature, date)