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| Revision 1   |  | 20/09/2023 |
| WD-25-DOC-01 | Business partner code of conduct «WEST DALA» LLP                                 | 1 of 7     |

Approved by  
General Director of  
«West Dala» LLP  
K. Sh Salakhedenov  
«27» November 2023r.





**BUSINESS PARTNER CODE OF CONDUCT  
«WEST DALA» LLP**




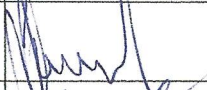

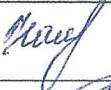

**WD-25-DOC-01**


**Атырау  
2023**

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### Approval sheet

| Position   | Full name            | Signature  | Date       |
|--|----------------------|--|------------|
| <b>Developed</b>   |                      |  |            |
| Head of Legal Support Service                                    | Takhitalieva K.K.    |   | 27.11.23   |
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| Head of Legal Affairs Department                                 | Umirzakhov N.U.      |   | 27.11.23   |
| Head of Internal Security Department                             | Kuzmin V. G.         |   | 27.11.23   |
| Head of Compliance Department                                    | Elubaev Zh. M.       |    | 27.11.23   |
| Head of Ecology Department                                       | Naurzbaeva A. K.     |   | 27.11.23   |
| Head of the Department of Industrial Safety and Labor Protection | Duisebaev B. A.      |   | 27.11.23   |

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## 1. INTRODUCTORY PRIVISIONS

- 1.1. West Dala LLP strives to conduct its business with integrity and social responsibility in accordance with international sustainable development practices, taking into account the United Nations Sustainable Development Goals and the principles presented in the United Nations Global Compact.
- 1.2. The Business Partner Code of Conduct (hereinafter referred to as the Code) sets out West Dala LLP's expectations regarding the Business Partners' approach to conducting business. The Code is designed to explain to Business Partners the priorities and expectations of West Dala LLP with respect to responsible partnership and sustainable development.
- 1.3. West Dala LLP expects its Business Partners to share West Dala LLP's commitment to ethical, fair, and safe business practices.
- 1.4. The provisions set out in the Code apply to all Business Partners of West Dala LLP.
- 1.5. In cases where the provisions outlined in the Code differ from the requirements of the applicable laws of the Republic of Kazakhstan, Business Partners are recommended to comply with such provisions while remaining within the scope of the applicable laws of the Republic of Kazakhstan.

## 2. Key terms and definitions

Business Partner - a legal entity (including its employees) or an individual who is engaged to perform work for West Dala LLP or jointly perform work, or who supplies goods to West Dala LLP or provides services to West Dala LLP.

## 3. FAIR AND ETHICAL CONDUCT OF BUSINESS

- 3.1. West Dala LLP expects its Business Partners to strictly comply with the laws of the Republic of Kazakhstan when fulfilling their obligations under the contracts concluded with West Dala LLP.
- 3.2. Business Partners should ensure that the products, works and services they provide for West Dala LLP comply with the laws of the Republic of Kazakhstan.
- 3.3. Business Partners should adhere to fair competition and comply with the antitrust and competition protection laws of the Republic of Kazakhstan.
- 3.4. West Dala LLP expects its Business Partners and their employees to promptly inform West Dala LLP of the occurrence or risk of a conflict of interest between West Dala LLP and Business Partners, including their employees, in particular by using the West Dala LLP hotline:  
Phone: +7 702 224 18 91  
Email: [hotline@westdala.kz](mailto:hotline@westdala.kz)
- 3.5. Business Partners should refrain from engaging in corruption, bribery, fraud, commercial bribery and other actions prohibited by the anti-corruption legislation of the Republic of Kazakhstan.
- 3.6. Business Partners should avoid any form of money laundering and must not engage in money laundering.
- 3.7. West Dala LLP recommends its current and potential Business Partners to inform, prior to entering into a contract with West Dala LLP and at any time during the execution phase of the contract, any pending litigation, investigation or enforcement action by governmental authorities alleging that a Business Partner is involved in any corruption, money laundering or any similar illegal activity.
- 3.8. West Dala LLP expects that its Business Partners will inform West Dala LLP in a timely manner of financial, legal, reputational and other issues that may result in a default under contracts entered into with West Dala LLP.
- 3.9. West Dala LLP recommends that its Business Partners implement appropriate policies, rules, procedures, and training programs to comply with this Code.

## 4. OCCUPATIONAL HEALTH AND SAFETY

- 4.1. Business Partners are recommended to strictly enforce compliance with the applicable laws of the Republic of Kazakhstan and health and safety regulations, as well as West Dala LLP's health and safety policies and procedures, to ensure the safety and health of their employees and West Dala LLP's employees.
- 4.2. West Dala LLP expects its Business Partners to provide its employees with appropriate protective clothing and equipment and to provide them with the proper training necessary to perform their job duties.

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4.3. West Dala LLP recommends its Business Partners to implement procedures and systems to prevent, control and track work-related injuries and illnesses, including systems for classifying and recording injuries and illnesses, and procedures for providing necessary medical care.

4.4. West Dala LLP recommends its Business Partners to provide employees with appropriate regular training and adequate health and safety information at work.

4.5. Given that occupational health and safety is a priority at West Dala LLP, Business Partners are recommended to work with West Dala LLP to identify opportunities to enhance safety and minimize any negative impact on the health and safety of employees.

4.6. The products, work and services of Business Partners should comply with all applicable product, work and service safety specifications in the Republic of Kazakhstan.

## **5. NON-DISCRIMINATORY WORKING ENVIRONMENT AND COMPLIANCE WITH LABOR RIGHTS**

5.1. Business Partners should refrain from discriminating against anyone in employment or within the scope of employment. In particular, West Dala LLP expects its Business Partners to avoid unfair or unlawful discrimination based on religion, ethnicity, gender, disability, social class and other distinctive individual characteristics and attributes.

5.2. West Dala LLP expects its Business Partners to avoid inhumane treatment of employees, including any form of violence or verbal abuse, harassment or other forms of oppression.

5.3. West Dala LLP expects its Business Partners to recognize labor rights as an integral part of human rights, in particular in terms of applying fair and reasonable terms and conditions of employment, including, but not limited to, working hours and remuneration.

5.4. Business Partners are recommended to set working hours, wages and overtime pay for hours worked in accordance with the applicable laws of the Republic of Kazakhstan.

5.5. West Dala LLP expects that its Business Partners will recognize and respect the rights of its employees, subject to applicable laws of the Republic of Kazakhstan, to freedom of assembly, freedom of association and collective negotiation.

5.6. West Dala LLP recommends its Business Partners to provide a mechanism for employees to report any harassment or discrimination without retaliation directed against the person making the report in good faith.

5.7. West Dala LLP expects its Business Partners to respect the local communities in which they operate and the human rights of community members.

5.8. West Dala LLP recommends to its Business Partners to consider the impact on local communities when recruiting, utilizing and deploying staff.

## **6. CHILD LABOR, FORCED AND HUMAN TRAFFICKING**

6.1. West Dala LLP expects its Business Partners to unconditionally refrain from using child labor in their operations and supply chains, taking into account the requirements of the applicable laws of the Republic of Kazakhstan on the minimum age of employment, including by ensuring that mechanisms are in place to verify the age of employees and new applicants.

6.2. West Dala LLP expects its Business Partners to have zero tolerance for the use in their operations and supply chains of forced labor, human trafficking, and any labor activity that involves unlawful restriction of employees' freedom of movement, debt-based labor, withholding of wages or identity documents.

## **7. ENVIRONMENT**

7.1. West Dala LLP expects its Business Partners to comply with applicable environmental legislation, including in terms of the Business Partners' possession of current required licenses and certificates.

7.2. West Dala LLP recommends its Business Partners to encourage the use of work practices that reduce environmental impact and to exercise caution when using any environmentally impactful processes and materials.

7.3. West Dala LLP expects its Business Partners to comply with current requirements for the safe handling, movement, storage, recycling or reuse and disposal of goods and generated waste.

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7.4. West Dala LLP expects its Business Partners to endeavor to regularly assess and monitor their greenhouse gas emissions. West Dala LLP recommends its Business Partners to provide West Dala LLP with annual data on the carbon footprint of their operations.

7.5. West Dala LLP recommends its Business Partners to apply responsible environmental management certification such as ISO 14001.

## 8. CONFIDENTIALITY ND DATA PROTECTION

8.1. West Dala LLP expects its Business Partners to mutually respect the confidentiality regime with respect to information that falls under the definition of confidential, including personal data of West Dala LLP employees and representatives of Business Partners, as well as information that constitutes a trade secret of West Dala LLP.

8.2. Business Partners should process and disclose confidential information and personal data obtained during business cooperation with West Dala LLP only with the consent and at the request of West Dala LLP and in accordance with the applicable laws of the Republic of Kazakhstan.

8.3. Business Partners should protect personal data and confidential information from unauthorized and unlawful use, disclosure, access, loss, alteration, damage and destruction.

8.4. West Dala LLP expects that its Business Partners will not violate applicable intellectual property laws of the Republic of Kazakhstan or other regulations on intellectual property rights.

## 9. INFORMING ABOUT CONCERNS AND POSSIBLE VIOLATIONS

9.1. West Dala LLP expects its Business Partners to report in good faith all incidents related to the activities of West Dala LLP that have caused them concern in the course of their business dealings, as well as possible violations of the laws of the Republic of Kazakhstan, the provisions of the Code or ethical standards.

9.2. Business partners are recommended to use the West Dala LLP hotline:

Phone: +7 702 224 18 91

Email: [hotline@westdala.kz](mailto:hotline@westdala.kz)

9.3. Concerns, as well as possible violations of the laws of the Republic of Kazakhstan, provisions of the Code or ethical standards, can be reported anonymously. West Dala LLP expects its Business Partners to inform its employees that they will not be retaliated against for reporting a potential violation in good faith.

9.4. West Dala LLP handles communications received from Business Partners in a regulated manner.

9.5. West Dala LLP recommends its Business Partners to adopt their own whistleblowing policies and procedures to govern the process of reporting any violations, suspected wrongdoing and suspicious incidents involving a Business Partner, including improper behavior resulting in unethical business practices. It is expected that such policies and procedures will be public and will protect a good faith informant of Business Partners from retaliation.


## 10. COMPLIANCE WITH THE CODE

10.1. Business Partners that do not adhere to the Code may be subject to a review of their future relationship with West Dala LLP.

10.2. When choosing Business Partners, West Dala LLP reserves the right to prioritize those Business Partners that demonstrate their commitment to sustainability.

### Change registration list

| Redaction  | Revision date | Description of the changes made                             | Position/full name person who made the changes  |
|------------|---------------|---|---|
| Revision 1 | 20.09.2023    | Initial version, in connection with the introduction of ESG | Head of Legal Support Service Takhitalieva K.K. |

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| <b>№</b> | <b>Full Name</b> | <b>Position</b> | <b>Date</b> | <b>Signature</b> |
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