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APPROVED BY
 General Director of
 West Dala LLP
 K.Sh. Salahadenov
 2023




**HUMAN RIGHTS, DIVERSITY AND EQUAL
 OPPOTUNITIES POLICY OF WEST DALA LLP**



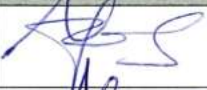
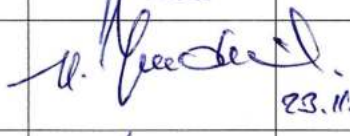


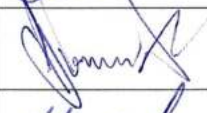
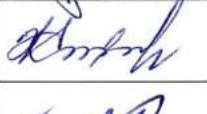



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 The planned revision date for this document is 20.09.2026*

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Approval sheet

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1. GENERAL PROVISIONS

- 1.1. The Human Rights, Diversity and Equal Opportunities Policy (hereinafter referred to as the Policy) sets out West Dala LLP's principles and priorities on human rights, diversity and equal opportunities and is a voluntarily adopted public document.
- 1.2. The Policy has been developed in accordance with the Constitution and legislation of the Republic of Kazakhstan, international norms and standards for the protection of human rights, which are enshrined in the United Nations Universal Declaration of Human Rights of December 10, 1948, the International Covenant on Economic, Social and Cultural Rights of December 16, 1966, and the United Nations Global Compact, among others.
- 1.3. The goal of the Policy is to respect internationally proclaimed human rights, to ensure equal opportunities, to take into account unique personal characteristics and non-discrimination at all stages of activities of West Dala LLP.
- 1.4. The Policy is mandatory for all employees of West Dala LLP.

2. TERMS AND DEFINITIONS

Business partners - suppliers, contractors, consultants and other persons having business and commercial relations with West Dala LLP;

Discrimination - any restriction or infringement of human rights and freedoms, as well as granting any advantages depending on circumstances unrelated to a person's business qualities, on grounds of origin, social, official and property status, sex, race, nationality, language, attitude to religion, beliefs, place of residence, age or physical disabilities, membership of public associations or other circumstances;

Stakeholder - a person or a group of persons involved to a greater or lesser extent in the activities of West Dala LLP, interested in interacting with West Dala LLP, having influence on West Dala LLP or being influenced by West Dala LLP;

Inclusion - creating an environment where different socio-cultural groups of people and each employee individually are valued, accepted and respected for their unique skills, experiences and perspectives, and where they are given equal opportunities to participate in the progress of West Dala LLP, regardless of any circumstances;

Diversity - specificity of the working environment, oriented towards acceptance of culturally and socially different groups and individuals, as well as adequate and impartial assessment of their specific skills, competencies, development prospects and other characteristics;

Human rights - inalienable rights of every human being, based on the recognition of the inherent dignity of the human person and the freedom and equality of all human beings;

Forced labor - any activity, work or service required of a person under threat of any coercion or penalty and for which that person did not voluntarily offer his or her services;

Equality - the principle of respecting the characteristics and factors that cause differences between employees, abilities and other unique characteristics of employees, and, as a result, providing equal opportunities to employees;

Equal opportunities - an approach that treats all employees equally and is not influenced by discriminatory factors.

3. BASIC HUMAN RIGHTS PRINCIPLES

- 3.1. West Dala LLP is focused on the fact that all people are free and equal in dignity and rights, regardless of gender, language, age, religion, ethnicity, race, social origin, property status or other attributes and individual characteristics.
- 3.2. West Dala LLP is striving not to discriminate and infringe on human dignity on any grounds and individual characteristics.
- 3.3. West Dala LLP does not accept any forms of child labor that do not comply with the legislation of the Republic of Kazakhstan.
- 3.4. West Dala LLP demonstrates zero tolerance for any form of compulsory or forced labor and human trafficking.
- 3.5. West Dala LLP strives to identify and prevent any adverse human rights impacts as part of its operations by exercising due diligence.

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3.6. West Dala LLP respects the rights of all employees, including freedom of expression and collective bargaining. None of employees of West Dala LLP may be restricted in their labor rights, except in cases and according to the procedure stipulated by the legislation of the Republic of Kazakhstan.

3.7. West Dala LLP strives to ensure that every employee has the right to receive and provide regular feedback.

3.8. West Dala LLP guarantees confidentiality of personal data and other legally protected secrets of clients, employees, business partners and other persons in accordance with the requirements of the legislation of the Republic of Kazakhstan.

3.9. West Dala LLP reserves the right to conduct a social and environmental impact assessment procedure for potential clients and business partners.

3.10. West Dala LLP welcomes business partners to have a clearly articulated corporate position on human rights.

3.11. West Dala LLP does not support any action that promotes, encourages or incites other persons or other organizations to violate or disregard human rights.

4. BASIC PRINCIPLES OF DIVERSITY AND EQUAL OPPORTUNITIES

4.1. Ensuring diversity, equal opportunities and inclusion for West Dala LLP employees is an important factor for long-term development and competitiveness of the business. Taking this into account, West Dala LLP is guided by the following basic principles:

1) Equal opportunities.

West Dala LLP provides equal opportunities to all job applicants and employees in accordance with clearly defined and generally accepted rules of employment and labor rationing, taking into account available competencies and within the limits of job descriptions, regardless of individual distinctive characteristics unrelated to business qualities of a person.

This principle applies to all aspects of employment of West Dala LLP employees, including remuneration and working conditions, training, career progression, conduct at work, disciplinary procedures, and termination of employment in accordance with the legislation of the Republic of Kazakhstan and internal documents of West Dala LLP.

West Dala LLP does not tolerate any infringement of human dignity, including all forms of harassment and humiliation, as well as any forms of patronage, in particular those based on family ties. All forms of workplace violence, including verbal, physical and psychological violence, are prohibited.

2) Encouraging diversity.

By prioritizing diversity as a competitive advantage, West Dala LLP strives to create a culturally and socially diverse workforce.

West Dala LLP supports the uniqueness of each of its employees and does not discriminate them directly or indirectly in any form.

West Dala LLP respects the diversity of personal values and worldviews and does not prevent employees from openly expressing their views and opinions.

West Dala LLP strives to involve men and women equally in all aspects of operations and management processes, taking into account the specific nature of its business.

3) Decent and comfortable working environment.

West Dala LLP strictly complies with the labor legislation of the Republic of Kazakhstan. Labor conditions created in West Dala LLP comply with the requirements of the health and safety legislation of the Republic of Kazakhstan, as well as the requirements of the relevant internal documents of West Dala LLP.

West Dala LLP encourages transparency in labor relations and helps all employees to develop and build their careers by providing support, mentoring and creating conditions for professional growth.

West Dala LLP strives to maintain a competitive and decent level of remuneration of its employees. The amount of remuneration of members of the governing body, executive body and employees is formed on the basis of objective factors related solely to the efficiency of performance of job duties.

West Dala LLP provides all employees with social guarantees in accordance with the requirements of the legislation of the Republic of Kazakhstan.

West Dala LLP encourages any initiatives and ideas of employees, the implementation of which may be important for the development of West Dala LLP.

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5. IMPLEMENTATION OF THE PRINCIPLES AND APPROACHES OF THE POLICY

- 5.1. West Dala LLP organizes familiarization of employees with the Policy and its principles.
- 5.2. West Dala LLP carries out internal monitoring and control of compliance of its activities with the principles approved in the Policy.
- 5.3. West Dala LLP provides customers, employees, business partners and other stakeholders with the opportunity to freely report possible violations of the Policy provisions, guaranteeing confidentiality of communications.
- 5.4. Complaints about violation of the provisions of the Policy are accepted through the Hotline:
Phone: +7 702 224 18 91
E-mail: hotline@westdala.kz
- 5.5. All complaints about violations of the Policy must be accepted and considered by the responsible structural unit of West Dala LLP within a reasonable period of time.
- 5.6. Upon confirmation of the facts of violation of the Policy, the structural unit responsible for internal control takes measures to eliminate and prevent such violations.
- 5.7. West Dala LLP adheres to a zero-tolerance policy of retaliating against employees who report a possible violation of the Policy, even if the concerns are not substantiated, provided that the misrepresentation was not made intentionally or for personal gain.
- 5.8. Non-compliance with the Policy may become the basis for bringing an employee who violated the Policy to disciplinary responsibility in accordance with the legislation of the Republic of Kazakhstan, as well as internal documents of West Dala LLP.

6. COMPLIANCE WITH THE POLICY

- 6.1. All employees of West Dala LLP must follow the requirements and principles set out in the Policy, as well as comply with the human rights legislation of the Republic of Kazakhstan.
- 6.2. Violation of the provisions of the Policy and failure to comply with the applicable laws of the Republic of Kazakhstan may result in West Dala LLP taking disciplinary action against the relevant employees.

7. FINAL PROVISIONS

- 7.1. The Policy is enforced from the date of approval by the General Director of West Dala LLP.
- 7.2. The Policy is reviewed as necessary, but at least once every 3 (three) years for its relevance and compliance with applicable norms and standards, including mandatory changes in the requirements of the current legislation of the Republic of Kazakhstan.
- 7.3. The decision to recognize the Policy as invalid comes into force on the day when a new version of the Policy or a substitute internal document comes into effect, or from the day when the decision is made by the General Director of West Dala LLP.
- 7.4. In case of changes in the legislation of the Republic of Kazakhstan and emergence of contradictions between certain provisions of the Policy and the legislation of the Republic of Kazakhstan, such provisions of the Policy become invalid, and employees of West Dala LLP are guided in their activities by the legislation of the Republic of Kazakhstan until the relevant amendments and additions are made to the Policy.

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REVISION RECORD SHEET

Revision	Date of revision	Description of changes made	Title/Full name of the person that made the change
Revision 1	20.09.2023	Initial version, in connection with the introduction of ESG	Deputy Head of Human Resources and Industrial Relations A.U. Temirtassova

ACKNOWLEDGEMENT SHEET

No.	Full Name	Position	Date	Signature