

# **Code of Ethics**

## **Impeks Petroleum KZ**

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Code of Ethics Impeks Petroleum KZ

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## Introduction

With this Code of Ethics, Impeks Petroleum KZ (hereinafter “Impeks Petroleum KZ”) defines the principles of ethics and ethical rules of behaviour and conduct of the Management and all its employees.

The Code applies to all Impeks Petroleum KZ employees, regardless of their position or field of work, as well as to other persons acting on behalf of Impeks Petroleum KZ. The Code serves as a guide for employees in their everyday conduct and aids in avoiding situations in which they may violate internal rules and legislation and thus cause damage to Impeks Petroleum KZ or otherwise harm its reputation.

Management Board  
Impeks Petroleum KZ

## **I. Impeks's Mission and Values**

### **Mission**

Impeks mission is to provide a competitive, reliable, and flexible supply of natural gas.

### **Impeks's Vision**

Impeks Petroleum KZ aims to maintain its leading position as a natural gas trader in Kazakhstan and plans to focus its core business also on neighbouring countries. Impeks Petroleum KZ focuses on conducting and developing its core business of natural gas trading, optimising the upstream-downstream portfolio, competitiveness and security of supply, developing and marketing services to support the implementation of sales contracts, developing new markets, market segments, and products, developing and marketing energy services in the field of energy efficiency and energy consulting, and seeking new opportunities in the energy market in Kazakhstan and beyond.

In its activities, Impeks Petroleum KZ follows the values of reliability and efficiency and fosters highly professional business relationships. Impeks Petroleum KZ promotes professionalism, initiative-taking, good interpersonal relationships, adaptability, and receptivity to the natural and social environment in its employees.

The activities of Impeks Petroleum KZ and its employees are aligned with the following supportive values:

- honesty,
- respect for colleagues and clients,
- respect for company resources,
- straightforward and open communication within Impeks Petroleum KZ and beyond,
- diligence,
- proactivity,
- innovation,
- integrity, and responsibility.

Impeks Petroleum KZ follows the guidelines of the ISO 26000 standard on the social responsibility of companies, which takes into account the declarations and conventions of the United Nations and its founding members, in particular of the International Labour Organisation.

### **General Ethical Principles**

Each employee is expected to act in accordance with Impeks's values.

Impeks Petroleum KZ's employees act in line with the principle of honesty. They apply the same criteria to all colleagues and clients. Impeks Petroleum KZ enables its employees to express themselves freely and takes into account their arguments and opinions.

Impeks Petroleum KZ's employees respect their colleagues and clients in their work. They show respect with polite and sincere attitudes and by respectfully welcoming the initiatives and opinions of others, regardless of their position, age, gender, or other differences. Impeks Petroleum KZ shows respect for its employees through the fair treatment of their contribution to the company's success, as well as by providing rewards and commendation.

Impeks Petroleum KZ's employees respect the company's tangible and intangible resources. They understand that their colleagues' time is one of the important company resources and strive for a timely and clear allocation of work tasks. Respect for Impeks Petroleum KZ's intangible resources is reflected in the responsible management of employees' time.

Impeks Petroleum KZ's employees strive for straightforward and open communication within Impeks Petroleum KZ and beyond. Impeks Petroleum KZ's communication and communication within Impeks Petroleum KZ are characterised by clear and unambiguous instructions, targeted communication, and the provision of important information to those who need it for their work.

Impeks Petroleum KZ's employees carry out their work with dedication. They take initiative, are assertive and responsive, make quick but informed decisions, and consistently fulfil their tasks and responsibilities.

Impeks Petroleum KZ's employees are proactive and innovative in their work. Impeks Petroleum KZ welcomes and respects the search for new solutions and suggestions for improvement put forward by its employees.

Impeks Petroleum KZ's employees carry out work responsibly and with a high level of personal integrity. Employees take on responsibilities in line with their position or function and make informed, assertive, and timely decisions. Employees respect the agreements made. Impeks Petroleum KZ's requirements for employees take into account their experience, knowledge, and professional competence. Changes at Impeks Petroleum KZ are introduced in a deliberate manner.

## **II. Areas of Responsibility**

### **Responsibility of Management Bodies towards Employees and Impeks Petroleum**

Management is committed to good interpersonal relationships and developing a creative work environment.

Management does not allow or tolerate any discrimination, harassment, or mobbing in the workplace. Each employee has the right to the protection of their person at work and to a professional, safe, and healthy work environment.

Promoting employee development and training are ongoing tasks, and each employee has the duty to pass on the acquired knowledge to their colleagues. The high level of expertise ensures the quality of services offered by the Company to its business partners, thereby enhancing Impeks's reputation and ensuring its long-term growth.

Impeks respects employees' privacy and ensures the protection of their personal data, implementing this by acting in accordance with the relevant internal acts and by strict compliance with the law. Interferences with an employee's privacy are allowed only in cases of urgency and are defined by law or internal acts.

### **Example of Impeks Management**

Management builds the employees' trust and ensures Impeks Petroleum KZ long-term success by acting with honesty and transparency.

## **III. Responsibility of Employees towards Impeks**

### **Acting in accordance with Impeks Petroleum KZ's General Interests**

Management, employees, and others acting on behalf of Impeks Petroleum KZ are, within the scope of their powers and responsibilities, committed to fulfilling Impeks Petroleum KZ's objectives in line with the law and other regulations and acts of Impeks Petroleum KZ. Achieving Impeks Petroleum KZ's objectives is guided by good business practices in each area of activity.

Management and employees are obliged to be familiar with Impeks Petroleum KZ's internal acts and comply with them in accordance with their duties, powers, and responsibilities or their area of work.

Employees take full responsibility for their work and enhance their contribution to Impeks Petroleum KZ's performance with additional training and acquiring new skills needed for their work, as well as contributing to the success of all employees by passing on their knowledge and experience to their colleagues. Employees are responsible for their own continuous development, for which Impeks Petroleum KZ ensures the appropriate conditions.

## **Avoiding Conflict of Interests between Employees' Work at Impeks Petroleum KZ and their Personal Affairs or Affairs of their Families**

Impeks Petroleum KZ's employees may engage in financial, business, and other activities or relationships outside Impeks Petroleum KZ, but their conduct must not result in a conflict of interests between their personal interests or those of third parties and the legitimate interests of Impeks Petroleum KZ.

When acting on behalf of Impeks Petroleum KZ, employees must avoid circumstances that result in a conflict of interests that impact their judgement, objectivity, or loyalty to Impeks Petroleum KZ.

Each employee has the duty to prioritise the best interests of Impeks Petroleum KZ over their own interests or those of third parties when performing their work tasks, exercising their rights and responsibilities arising from their job or position, and when making business decisions or carrying out any activities on behalf of Impeks Petroleum KZ.

Employees have the duty to inform their supervisor of any existing or potential conflicts of interest in themselves, another employee, or another person acting on behalf of Impeks Petroleum KZ.

## **Employees' Responsibility towards Impeks Petroleum Property and Responsible Management of Impeks' Assets**

Impeks Petroleum KZ property should be handled in an economical and responsible manner and should be protected against damage, destruction, disposal, misuse or loss. Property is used exclusively for achieving Impeks Petroleum KZ business objectives, in line with the powers of each employee, and never for private purposes, for which the employees are personally liable.

### **Prudent Use of Impeks Petroleum KZ Property**

Impeks Petroleum KZ's employees handle the company's property with due diligence and in accordance with their powers. They strive for rational use of property and continuous improvement of business processes.

In the area of modern information and communication technology (ICT) use, employees strive to maximise the efficient use of assets and put forward suggestions for ICT improvements. Impeks Petroleum KZ's property is intended for business use, and personal use is limited to minimum use in permissible urgency cases in accordance with good business practices and culture and in a manner that does not cause harm to Impeks Petroleum KZ's reputation.



## **Professional Secrecy and Protection of Impeks Petroleum KZ Other Confidential Information**

Business information is considered property and a competitive advantage and should be treated with special care. Information is confidential when labelled as such and also when it is not labelled, but it is apparent that it would cause significant damage if an unauthorised person gained access to it. Confidential information concerns all areas of operation (e.g. strategy, business plans, financial data, sales and pricing data, contracts, business partners, etc.) and is considered as such until it is made public. Before any exchange of confidential information with third parties, an agreement on the protection of confidential information and business secrecy setting out the parties' obligations must be signed.

In general, employees do not disclose any information about Impeks Petroleum KZ's business to anyone unless they have been specifically authorised to do so. If an employee comes in contact with business information that is not part of their work, they shall immediately notify a supervisor.

Careful handling of information technology ensures smooth and secure business operations, and each individual contributes by handling information responsibly.

Impeks Petroleum KZ protects information from unauthorised access through continuous improvements in information security policy and the setting up of relevant security procedures.

## **IV. Responsibility towards Clients, Customers, Suppliers and Partners**

In communication with clients, it is important to try to recognize and understand clients' wishes and requirements and to gain feedback, which enables the establishment of a long-term and partner relationship. The basic principles of business communication and business etiquette should be followed regardless of the form of communication.

Impeks Petroleum KZ does not use internal information to gain an advantage in the market.

Employees seek the best solutions for Impeks Petroleum KZ's customers.

Impeks Petroleum KZ supports transparency and non-discrimination in all energy markets.

Impeks Petroleum KZ is responsible for the selection and ensuring the appropriate and professional conduct of its employees and all external contractors in accordance with the provisions of this Code. The responsible persons of the area and services that contract external contractors are responsible for the careful examination of external contractors as regards their credibility, professionalism, reputation and creditworthiness in accordance with the fundamental values and principles of this Code. The persons responsible for the areas and services that contract external contractors ensure that the fundamental principles of the Code are included in the contracts with external contractors and monitor their implementation

## V. Responsibility towards Stakeholders

### Impeks Petroleum KZ Efforts towards Maximising Added Value for its Owners

Impeks Petroleum KZ builds its relationship with its stakeholders in accordance with the legislation or regulations governing companies and the energy sector and in line with other regulations and codes of regulators in the field of energy and protection of competition. Impeks Petroleum KZ's bodies are committed to achieving long-term business performance, thereby ensuring long-term sustainable operating profitability for its owners and the long-term stability of Impeks Petroleum KZ's operations. In addition to the stakeholders' interests, account is also taken of the interests of other shareholders:

- consumers who are provided with a long-term, reliable, quality, and competitively priced natural gas supply by the Company,
- employees who are provided with a suitable work environment and an opportunity for professional development by the Company,
- wider community by ensuring environmentally acceptable supply and by acting responsibly towards the natural and social environment.

All transactions are documented in accordance with the legislation, applicable accounting standards, and internal regulations. The Company notifies the owners and other interested parties of its operations within the deadlines and in the manner prescribed.

### Informing Owners of Major Developments in Impeks Petroleum KZ Operations

Impeks Petroleum KZ provides its stakeholders with complete, timely, up-to-date, accurate and fair information about all aspects of its operations that are not business secrets on a nondiscriminatory basis. It thereby enables its stakeholders to familiarise themselves with Impeks Petroleum KZ's operations and make relevant business decisions on that basis. Information is always provided solely by authorised persons.

## VI. Impeks Petroleum KZ Responsibility towards Wider Social Community

### Compliance with the Legislation and Impeks Internal Acts, in particular in the Field of Protection of Competition and Trade Rules

Any conduct, decision, business relationship or transaction carried out by any person on behalf of Impeks Petroleum KZ in conducting business or in relation to conducting business in the domestic or foreign market that would violate Kazakh or EU legislation or the legislation of

another country applicable to the conduct, decision, business relationship, or transaction in question is prohibited.

By adopting the Competition Rules Compliance Program, Impeks Petroleum KZ has undertaken to achieve its objectives in a manner that will ensure full compliance of its operations with competition law at all times.

## **Prohibition of Corrupt Practices and Unjustified Giving or Accepting of Gifts**

Impeks Petroleum KZ does not allow or tolerate any form of corruption. In addition to giving and accepting bribes, corrupt practices also include any other conduct used to achieve or seek an advantage or benefit for oneself or a third party by abuse of power or position or by acting against one's responsibilities.

Impeks Petroleum KZ, its Management, employees, and other persons acting on behalf of Impeks Petroleum KZ may not promise, offer, or give an undue advantage to business partners or any other person or receive an undue advantage from them. The term "advantages" means items, favours, and services that constitute a tangible or intangible advantage. Undue advantages also constitute advantages that are permissible in themselves but are intended to influence our or others' business decisions.

Occasional business gifts given to partners by the Company must be selected and given in a manner that cannot in any way be interpreted as providing an undue advantage.

Employees must reject any offered advantage or business gift given by business partners that could be considered undue.

An occasional gift accepted as an expression of appreciation or hospitality should not, in any case, influence our business decisions. Employees have the obligation to notify their supervisors of any gift or expression of hospitality they receive.

## **Correct Relationship with Officials**

Impeks Petroleum KZ cooperates with the competent supervisory authorities and institutions in their supervisory procedures conducted over Impeks Petroleum KZ or other persons, within the limits of the regulations setting out the protection of confidentiality and the scope of powers and competences of supervisory authorities and officials.

## **Respect for Human Rights both in Recruitment and in Treatment of Employees**

Impeks Petroleum KZ and its employees foster good interpersonal relationships and constructive cooperation and ensure mutual respect in the workplace.

When determining their rights, duties, and position, employees should be treated according to the principles of equality, proportionality, and integrity, based on their individual characteristics and criteria.

Employees ensure that their conduct in the workplace does not cause unpleasant feelings among their colleagues; they must not tolerate discrimination on any grounds, confrontational communication, or mobbing among their colleagues and have the duty to immediately report any improper conduct by individuals in their work environment to their supervisors.

Employees have the duty to respect the privacy of each individual and shall disclose personal data to specialist services or third parties only on the basis of a written request and solely for a purpose grounded in an internal act or law.

## **Environmental Protection and Social Responsibility**

The Company ensures the protection of the environment in the conduct of its business.

The Company makes donations and concludes sponsorship agreements exclusively in line with its mission, vision, and values, namely in the fields of sport and culture.

The Company does not provide financial or other aid for the activities of political parties and their members through donations or sponsorships.

## **Impeks Petroleum KZ Support to Local Communities and Humanitarian Activities**

In the event of natural disasters, the Company always provides help by ensuring financial support to the affected families or local communities. The Company also occasionally provides funds to humanitarian organisations.

## **VI. Impeks Petroleum KZ Responsibility towards Media**

### **Correct Relationship with Media**

Each year, Impeks Petroleum KZ adopts a *Communication Plan* for planned, proactive, and professional communication with the media and the interested public. The Chairman of the Management Board, the Board member, and other persons authorised by the Chairman of the Board are responsible for media relations.

## Informing the Public of Major Developments in Impeks Petroleum KZ Operations

Impeks Petroleum KZ also informs the interested public of its activities in accordance with the adopted Communication Plan, thus enabling everyone, not just natural gas consumers, to familiarise themselves with the current events involving the Company. This enables the Company to gain the public's trust and showcase its social responsibility.

## Implementation of the Code

- ✦ Communication – Communication – concrete measures for communicating the content of the Code of Ethics
- ✦ Management prepared a workshop on the content of the Code of Ethics for all employees who participated in the discussion and co-created the content of the Code. The Works Council has taken note of the Code of Ethics as well.
- ✦ The Code of Ethics is published in a standard manner and is accessible to all employees on the intranet and to the interested public on Impeks Petroleum KZ's website.
- ✦ The Code of Ethics of Impeks Petroleum KZ shall be communicated to Impeks Petroleum KZ's Supervisory Board.
  
- ✦ Internal measures – four-eyes principle, risk management, reporting of infringements, training
  
- ✦ To avoid unlawful and unethical conduct of Impeks Petroleum KZ or individuals, any case that is contentious under this Code of Ethics must be reported to the competent authorities at Impeks Petroleum KZ.  
 Reporting an infringement:
  - in the legal field: the head of Legal and General Services
  - in the field of employment relationships: the Works Council
  - in the field of management and decision-making: the Management or Supervisory Board.
  
- ✦ Control and sanctions – verifying credibility, internal revision, sanctions

Management ensures that the person who reported an infringement is protected from the potential pressures as a result of ethical conduct when making the report. The report is also reviewed by Impeks Petroleum KZ's Internal Control Body, which refers the matter to the Management or the Supervisory Board for a decision. The responsible supervisor is not included in the investigation of infringements of the Code referred to in the previous paragraph of this Article if they are in any way connected to the alleged infringement.

Infringements of the provisions of this Code, which are also infringements of the applicable legislation or Impeks Petroleum KZ's internal acts, constitute an infringement of work obligations and may result in disciplinary, damage, criminal, or other liability in accordance with the applicable regulations and internal acts of Impeks Petroleum KZ.

## Explanatory Statement

The Code of Ethics defines Impeks Petroleum KZ's values and standards of behaviour and conduct and serves as a guide for members of management bodies and employees of the company in their everyday conduct.

The employees' attitude towards Impeks Petroleum KZ is crucial for the company's operations. Only the employees who are loyal to the company and feel a sense of belonging to Impeks Petroleum KZ and a responsibility towards the company's assets and property can contribute the expected added value to its business. Employees are expected to show the same care in their work as in their own private affairs. Employees must avoid conflicts of interest. This includes owning stocks or shares of competitors (except in case of negligible amounts), conducting business with other companies employing their family members, working for others, in particular for competitors, and other personal affairs that may affect company management or work. Furthermore, the employees' attitude towards Impeks Petroleum KZ's assets is also of importance and requires responsible treatment of property and assets in their everyday work, limiting the use of the company's assets for personal purposes, etc. While professional secrecy is also regulated by the legislation, the company considers that, given its importance, this topic should be addressed in the codes of ethics as well.

Impeks Petroleum KZ's relationship with its owners – shareholders or stakeholders – is also of utmost importance for its business. This applies mainly to the management and supervisory bodies of the company, whose members must be aware that their mission is to enrich the capital that the owners have invested in the company in order to increase it. Responsible conduct by members of the management and supervisory bodies and all employees in conducting Impeks Petroleum KZ's business is a prerequisite for the company to generate the expected added value. In this context, it is extremely important that the company informs its owners not only of its ongoing business but also of the long-term objectives for achieving profit and maximising the value of the capital in line with the owners' expectations.

Impeks Petroleum KZ's objectives should not be solely economic. Every company should be guided by social responsibility. Social responsibility includes not only environmental responsibility but also, and mainly, responsibility towards the wider social community, respect for human rights, and, perhaps most importantly, strict compliance with the legislation. The prohibition of corruptive practices and the undue giving and accepting of gifts, which may influence the company's business decisions, are part of the broader responsibility of Impeks Petroleum KZ, members of its bodies, and all employees. The company should keep a record of the gifts received and given and must have a thorough system for dealing with cases of uncertainty regarding the giving and accepting of gifts.

Respect for human rights in Impeks Petroleum KZ's business operations is part of social responsibility, which is becoming increasingly important in today's context. Prohibition of discrimination based on gender, race, age, and other grounds, as well as strict rules regarding sexual harassment and mobbing in the workplace, are all part of the high standard of employee behaviour in any company. It is therefore not sufficient to regulate such prohibitions in legislation in general, as they should be internalised by the company in its internal acts and, above all, put into practice. Responsibility towards nature is one of the important factors in the operations of companies with state capital investment, particularly given the fact that many of them operate infrastructure that may significantly impact and harm the environment. It is therefore appropriate to recommend that Impeks Petroleum KZ's employees also cooperate with other

entities, especially civil society, in their relationship with the environment. Finally, cooperation with local communities and humanitarian activities of Impeks Petroleum KZ as part of social responsibility means that the company is involved in the local community and contributes to the activities and efforts to improve the quality of life in the local environment.

Impeks Petroleum KZ's relationship with the public and media should also be emphasised. The public's right to information, which is exercised mainly through access to important information obtained and published by the media, is one of the fundamental rights that coincides with the principle of transparency, which is one of the basic principles of corporate governance. Not only the owners and regulators but also the interested public should be informed about the more important issues related to the operation and development of Impeks Petroleum KZ.

## Explanations and Definitions of Specific Terms in the Code of Ethics

**Discrimination** is any act through which a person is treated unequally or is given unequal burdens or denied appropriate benefits. Discrimination is usually based on personal prejudices or stereotypes related to race, religion, nationality, politics, social status, ethnicity, geography, family or other affiliation, or gender, age, physical or any other personal characteristic or condition.

**Harassment** constitutes hostile or unpleasant comments and other communication or unwanted behaviour related to any personal circumstance, with the effect or purpose of harming the person's dignity or creating an intimidating, hostile, demeaning, humiliating, or insulting work environment.

**Mobbing** is committed by a person who, in the workplace or in connection with work, causes humiliation, fear, or anxiety in another employee through sexual harassment, psychological violence, bullying, or unequal treatment. Mobbing is expressed in the form of confrontational communication in the workplace among colleagues or between a subordinate and subordinate, with the targeted person being exposed to systematic and repeated attacks from one or more persons with the intent of or resulting in exclusion from the work environment or system, which is perceived by the targeted person as discriminatory.

**Personal data** is any data relating to an individual, regardless of the form in which it is expressed. Personal data may only be monitored if required by law or by the individual's personal consent. Access to personal data is allowed only to employees who need it to carry out work processes and to the authorities authorised by the law.

Circumstances that may give rise to **conflicts of interests** include:

- a private financial interest of an employee or related persons when the employee is acting on behalf of Impeks Petroleum KZ,
- conducting business with related persons, especially family members or related legal entities,
- the employee's activity subject to the definitions, rights, and obligations referred to in non-compete clauses and prohibitions as set out in the employment contract or employee's statement and in applicable laws,
- accepting gifts and similar benefits extending beyond the usual expression of appreciation in accordance with good business practices.

Impeks Petroleum KZ **property** is accurately recorded in accounting documents, which serve as a basis for sound business decisions, the fulfilment of financial and legal obligations, and informing the public. Any forgery, destruction, concealment, or disposal of these documents can lead to punishment for both individuals and the Company.

A **donation** is a unilateral legal transaction and represents a gift from Impeks Petroleum KZ corporate funds.

A **sponsorship agreement** is a bilateral legal transaction based on which the Company obtains a benefit – typically advertising – that can be monetarily valued in return for committed sponsorship funds.