

Anti-corruption Policy

CompletionSolutionsLLP

1. PURPOSE

1.1. This Anti-corruption Policy (hereinafter referred to as “the Policy”) is the main document of Completion Solutions LLP (hereinafter referred to as the “Company”) that defines the key principles and requirements aimed at preventing corruption and complying with applicable anti-corruption laws by the Company, employees and other persons who may act on behalf of the Company.

2. OBJECTIVES

2.1. The policy reflects the commitment of the Company and its management to high ethical standards of conducting an open and honest business to improve the corporate culture, follow the best corporate governance practices and maintain the Company's business reputation at the proper level.

2.2. The Company sets following goals:

- Minimize the risk of involvement of the Company Employees in corrupt activities regardless of their position in Company.
- Form a uniform understanding among Employees and other persons of the Company's policy on rejection of corruption in all forms and manifestations.
- Summarize and clarify the main requirements of the anti-corruption legislation of the Republic of Kazakhstan that may apply to the Company and Employees.
- Establish the duty for Company Employees to know and comply with the principles and requirements of this Policy, key norms of applicable anti-corruption legislation, as well as adequate procedures to prevent corruption.
- Summarize and explain the main requirements of the anti-corruption legislation of the Republic of Kazakhstan that may be applied to the Company.

3. USE AND DUTIES

3.1. All Company Employees must be guided by this Policy and strictly observe its principles and requirements.

3.2. Company Director is responsible for organizing all activities aimed at implementing the principles and requirements of this Policy.

3.3. The principles and requirements of this Policy apply to counterparties and representatives of the Company, and Employees, as well as other persons, in cases where the relevant obligations are set in agreements with them, in their internal documents, or directly follow from the law

4. APPLICABLE ANTI-BRIBERY LAW

4.1. In Kazakhstan, “bribery” means giving or receiving bribes, mediation in giving or receiving bribes, abuse of official position or authority, commercial bribery, payments to simplify formalities, illegal use by an official of his position to receive benefits in the form of money, valuables, other property, services, any rights for themselves or for other persons, or illegal provision of benefits or rights to this person by other persons.

4.2. Subject to the foregoing, it is strictly forbidden for all Company Employees, directly or indirectly, personally or through third parties, to participate in corruption actions, offer, give, promise, ask and receive bribes or make payments to simplify administrative, bureaucratic and other formalities in any form, including, in the form of cash, valuables, services or other benefits, to any persons and from any persons or organizations, including commercial organizations, government bodies, public services, private companies and their representatives.

4.3. The Company and its Employees must comply with the anti-corruption laws of the Republic of Kazakhstan, as well as the principles and requirements of the Policy, in any country in the world.

5. KEY PRINCIPLES

5.1. Counterparties due diligence: The company makes reasonable efforts to minimize the risk of business relations with counterparties that may be involved in corrupt activities, by assessing the tolerance of counterparties to bribery, including verifying that they have their own anti-corruption procedures or policies, their readiness to comply with requirements of this Policy and include anti-corruption clauses in the agreements, as well as provide mutual assistance for the ethical conduct of business and the prevention of corruption.

5.2. Informing and Training: the Company places this Policy in the public domain on the information leaflets in the offices of the Company, openly declares anti-corruption, welcomes and encourages compliance with the principles and requirements of this Policy by all counterparties, its Employees, and other persons, and helps to increase the level of anti-corruption culture by informing and training.

6. GIFTS AND EXPENSES

6.1. Gifts and hospitality expenses, including business hospitality, which the Employees on behalf of the Company can provide to other persons and organizations, or which the Employees, in connection with their work at the Company, can receive from other persons and organizations, must comply with the set of five indicated below the criteria:

- be directly related to the legitimate goals of the Company, for example, to the presentation or completion of business projects, holding conferences, successfully executing contracts, or to generally accepted holidays, memorable dates, anniversaries;
- be reasonably justified, proportionate and not luxurious;
- not constitute hidden remuneration for a service, action, inaction, connivance, patronage, granting rights, making a specific decision on a transaction, agreement, license, permit, etc. or attempt to influence the recipient for any other illegal or unethical purpose;
- not create reputation risk for the Company, Employees and other persons in the event of disclosure of information about gifts or hospitality expenses;
- not contradict the principles and requirements of this Policy and other internal documents of the Company and the norms of applicable law.

6.2. Gifts in the form of souvenir products (low-cost products) with Company symbols provided at exhibitions, open presentations, forums and other representative and marketing events in which the Company officially participates are allowed and considered as image/marketing materials.

6.3. Gifts on behalf of the Company, its Employees and representatives to third parties in the form of cash, cash or non-cash, in any currency are not allowed.

7. CHARITY AND SPONSORSHIP

7.1. The Company does not finance charity and sponsorship projects in order to obtain commercial advantages in specific projects of the Company.

8. PARTICIPATION IN POLITICAL ACTIVITY

8.1. The Company does not finance political parties, organizations and movements in order to obtain commercial advantages in specific projects of the Company.

9. INTERACTION WITH GOVERNMENT OFFICIALS

9.1. The Company refrains from paying any expenses for government officials and their close relatives (or in their interests) in order to obtain commercial advantages in specific projects of the Company, including

expenses for transportation, accommodation, food, entertainment, etc., or getting them at the expense of the Company other benefits.

10. INTERACTION WITH EMPLOYEES

10.1. The Company requires its Employees to comply with this Policy by informing them of the key principles, requirements and sanctions for violations.

11. PAYMENTS THROUGH INTERMEDIARIES OR FOR THE USE OF THIRD PARTIES

11.1. The Company and its Employees are prohibited from attracting or using intermediaries, partners, agents, joint ventures or other persons to perform any actions that are contrary to the principles and requirements of this Policy or the norms of applicable anti-corruption legislation.

12. ACCOUNTING BOOKS AND RECORDS

12.1. All financial transactions must be accurately, correctly and with sufficient level of detail reflected in the accounting book of the Company, documented and available for verification.

12.2. Simple Accounting LLP are responsible for the preparation and provision of full and accurate financial statements of the Company within the time period established by applicable law.

12.3. Misrepresentation or falsification of the Company's financial statements is strictly prohibited and is considered fraud.

13. EMPLOYEE PROTECTION

13.1. The Company declares that no Employee will be subjected to sanctions (including dismissed, demoted, deprived of a bonus) if he reported an alleged fact of corruption, or if he refused to give or receive a bribe, commit commercial bribery or mediate bribery, including if as a result of such a refusal the Company has lost profits or has not received commercial and competitive advantages.

14. REVISIONS

14.1. When identifying insufficiently effective provisions of this Policy or related business processes of the Company, or due to changes in the requirements of the applicable legislation of the Republic of Kazakhstan, the Director of the Company organizes the development and implementation of an action plan for updating this Policy and / or business processes.

15. RESPONSIBILITY FOR NON-COMPLIANCE (IMPROPER EXECUTION) OF THIS POLICY

15.1. Employees of the Company, regardless of their position, are personally responsible for observing the principles and requirements of this Policy, as well as for actions (inaction) of their subordinates who violate these principles and requirements.

15.2. Since the Company may be subject to sanctions for the participation of its Employees, contractors, and other persons in corruption activities, official investigations will be initiated for each reasonably reasonable suspicion or established fact of corruption within the framework allowed by applicable law.

15.3. Persons guilty of violating the requirements of this Policy may be brought to disciplinary, administrative, civil or criminal liability at the initiative of the Company, law enforcement agencies or other persons in the manner and on the grounds provided for by the legislation of the Republic of Kazakhstan, regulations and labor contracts.

Director, CompletionSolutions LLP

Bayanova Ainur

ПОДПИСЬ:

