

## 4.3.2. Observance of human rights and equal opportunities

### 4.3.2.1. Management approach

GRI 3-3, 406-1

Kazakhtelecom JSC undertakes obligations on the protection and observance of human rights, creates equal opportunities for all employees and excludes conditions for the occurrence of gender inequality and any types of discrimination.

The Company informs employees, contractors and other stakeholders about the policies and principles of conscientious conduct of business processes adopted at the Company.

Kazakhtelecom JSC regards the observance of human rights and the provision of equal opportunities as an integral part of its activities. The basis of work in this area is composed of the following key documents:

- Policy in the area of human rights;
- Policy in the area of equal opportunities, inclusivity and diversity.

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The Policies can be reviewed on the Company's website [telecom.kz](https://telecom.kz) in the "Sustainable development" section, the "Observance of human rights and equal opportunities" subsection.

### 4.3.2.2. Protection and observance of human rights

GRI 2-23

Kazakhtelecom JSC adheres to the principles of respect and protection of human rights in accordance with the legislation of the Republic of Kazakhstan and international standards. These principles are fixed in the Policy in the area of human rights approved by the Board of Directors. The Policy extends to all employees of the Company, is recommended for application in subsidiary organizations and is brought to the attention of suppliers and partners in contractual procedures. The Policy establishes the principles by which the Company is guided with the aim of observing human rights at all stages of the carrying out of its activities.

Main principles of the Policy in the area of human rights:

- The Company complies with the legislation of the Republic of Kazakhstan, as well as international norms and provisions on human rights, including the Universal Declaration of Human Rights adopted by the General Assembly of the UN, the UN Global Compact and the ILO Declaration on Fundamental Principles and Rights at Work.
- The Company adheres to the conviction that every person is free and equal in dignity and rights, regardless of gender, race, skin colour, nationality, language, origin, age, place of residence, attitude to religion, beliefs, affiliation or non-affiliation to public associations or any social groups; property, family, social and official position; other circumstances not related to the business qualities of the employee.

- The Company does not accept any forms of discrimination and infringements on human dignity, physical and psychological violence at the workplace.
- The Company opposes forced labour, child labour, human trafficking.
- The Company guarantees the protection of human dignity and the inviolability of private life.
- The Company adheres to the principle of absolute intolerance in respect of corruption.
- The Company strives to develop the procedure of management of risks in the area of observance of human rights in accordance with the best international practices.

The Policy extends to all employees, shareholders, clients and other stakeholders of the Company and is recommended for application in subsidiary organizations. Kazakhtelecom JSC, within the framework of contractual procedures, brings to the attention of its suppliers and partners the principles of the Policy in the area of human rights and ensures the signing by them of confirmation of familiarisation with its provisions.

### 4.3.2.3. Human rights due diligence

In 2025, within the framework of the project of the United Nations Development Programme "Sustainable development through the promotion of environmental justice and responsible business practices", a diagnostics of the policy and procedures of Kazakhtelecom JSC in the area of human rights and human rights due diligence was conducted. The assessment was performed with account for the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the fundamental conventions of the International Labour Organization, as well as international approaches in the

area of environmental justice and responsible business conduct. The conducting of such a diagnostics reflects the growing significance of issues of observance of human rights for the Company and the necessity of further development of systemic and preventive mechanisms of management of social, labour, gender, environmental and other risks related to the impact of business on stakeholders.

Based on the results of the diagnostics conducted, it was noted that at the Company a branched set of policies, procedures and mechanisms has been formed, covering key non-financial risks potentially affecting human rights, including occupational health and safety, information and cybersecurity, compliance, interaction with contractors, training of personnel and mechanisms of consideration of requests. At the same time, it is noted that the issues of management of human rights have not yet been formed into a single end-to-end process, while at the Company the prerequisites for the further development of the approach have already been formed. These issues are already taken into account in various directions of activities — occupational health, safety, work with contractors, training of employees and consideration of requests. This helps the Company gradually to build a more understandable and systemic approach to the protection of the rights of employees and other stakeholders.

As directions of further development, the integration of approaches in the area of human rights into the current system of risk management and corporate governance, the development of a human-centric approach to the assessment and prioritisation of risks, as well as more systemic use of data, mechanisms of requests and internal control loops for the prevention of negative impact on human rights are determined.

4.3.2.4. Monitoring and assessment of risks of violation of human rights

Kazakhtelecom JSC conducts systemic monitoring of the risk “Risk of violation of human rights”.

Current risk assessment:

- Probability: 2
- Impact: 1
- Position on the risk map: green zone.

From Q2,2024 to the current moment, positive dynamics is noted, at the same time the risk does not exceed the threshold values of the key risk indicator — “Number of requests on violations of the Policy in the area of human rights”.

Main risk factors

The following main risk factors affecting the realisation of the risk are included in the risk register:

- Violation of the legislation of the RK;
- Violation of international norms and provisions on human rights, including the Universal Declaration of Human Rights adopted by the General Assembly of the UN, the UN Global Compact and the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work;
- Discrimination, infringements on human dignity, including by religion, gender, language, age, nationality, presence of disability, as well as physical and psychological violence at the workplace;
- Forced labour, child labour, human trafficking (including by partners of other stakeholders);
- Corrupt acts;
- Violation of the confidentiality of personal data of clients;
- Non-observance of the Code of Business Ethics.

Consequences after the realisation of the risk

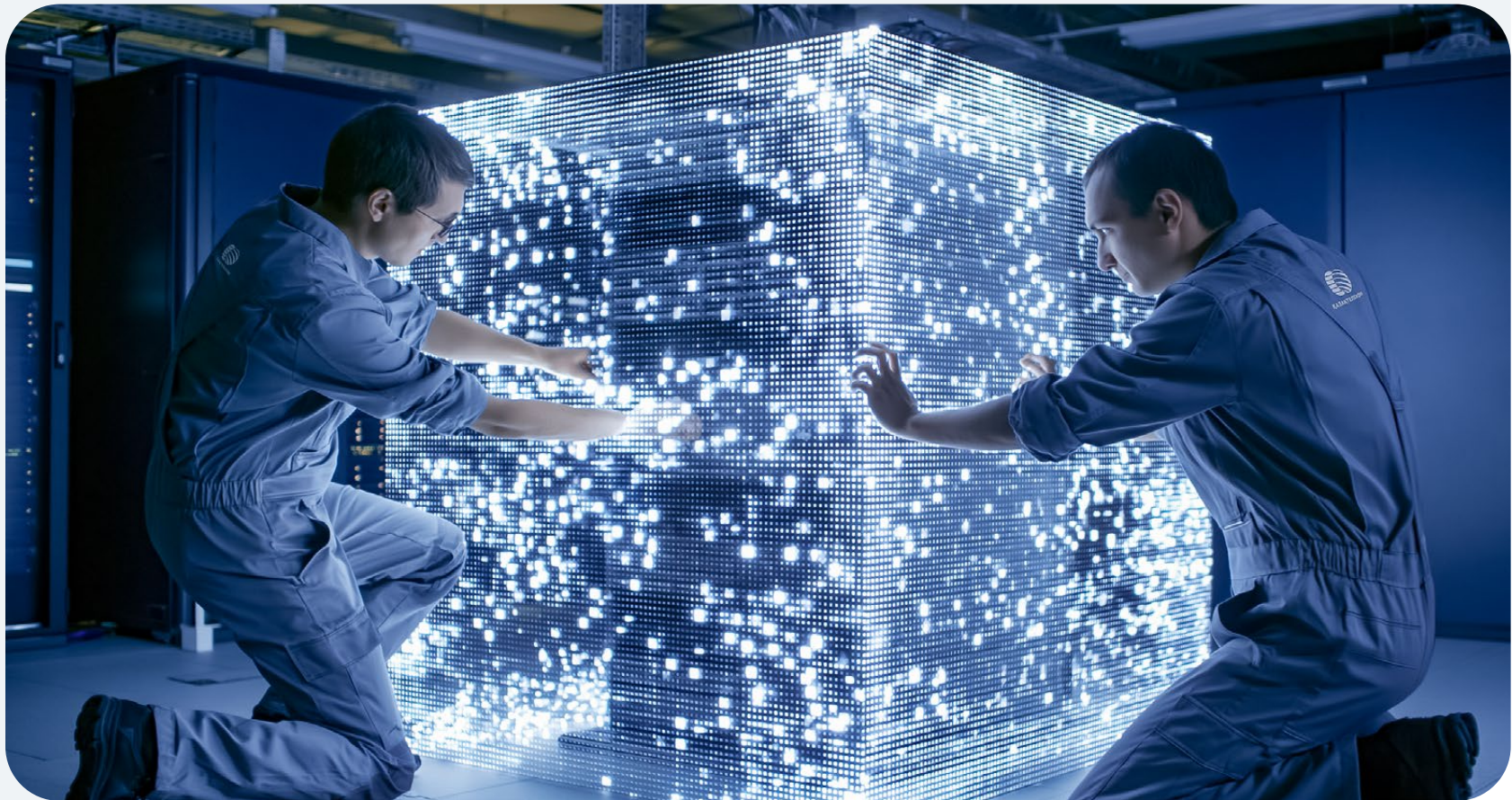
- Damage to the company’s reputation, since violations may attract negative attention from the public, shareholders and other stakeholders;
- Penalties;
- Lawsuits (including international — ECHR, UN, etc.);
- Administrative and criminal cases in the case of gross interference (for example, unjustified transfer of data to third parties);
- Loss of users’ trust, especially in the mass segment;
- Outflow of clients, negative in the media and social networks;
- Prohibition on the provision of certain types of services;
- Costs for the settlement of disputes, modernization of systems of protection and data storage;
- Loss in revenues due to the reduction of the user base;
- Claims from citizens, organizations, human rights defenders;
- Inclusion in the ratings of violators of human rights (for example, the reports of Human Rights Watch, Freedom House);
- Strengthening of control from the state;
- Fines for data leakage;
- Undermining of public trust in digitalization and innovations in the telecom sphere;
- Lawsuits, prescriptions, international complaints;
- Fall of the trust index, and deterioration of the image in the media;
- Protests, mass requests to bodies, undermining of stability;
- Restrictions on conducting activities in other countries, sanctions.

Measures on the mitigation of negative impact

Kazakhtelecom JSC implements the following measures for the prevention of violations (cover the Central Office, branches and subsidiary organizations):

- The Policy in the area of human rights has been introduced, accessible to all employees and partners;
- Regular training of employees on issues of human rights is conducted;
- Systemic monitoring of risks and their dynamics is conducted. The risk has been entered into the risk register and is under the control of the Department of Risk Management and Internal Controls;
- In contracts with suppliers and contractors, provisions on the observance of human rights are included;

- The principles of zero tolerance to discrimination, violence, child and forced labour are supported;
- The protection of personal data and confidentiality is guaranteed;
- Channels for the anonymous reporting of violations are operating:
  - Hotline: [8 800 080 47 47](tel:88000804747)
  - Compliance Service: [tlek.issakov@telecom.kz](mailto:tlek.issakov@telecom.kz)
  - Website: [www.sk-hotline.kz](http://www.sk-hotline.kz)
- Internal monitoring of the fulfilment of the principles of the Policy in the area of human rights is conducted;
- Integration of human rights principles into other corporate documents: Code of Business Ethics, Sustainable Development Policy, Policy of equal opportunities and inclusion and diversity.



#### 4.3.2.5. Equal opportunities

At the Company, the “Policy in the area of equal opportunities, inclusivity and diversity” continues to be in effect, developed with the aim of the development of the practice of equal opportunities, inclusivity and diversity, the consideration of unique personal characteristics and the non-admission of discrimination in respect of employees at all levels. The Policy corresponds to leading international norms and standards, and also takes into account the requirements of the legislation of the Republic of Kazakhstan.

### Main principles of the Policy:

- Compliance with the legislation of the Republic of Kazakhstan, as well as account for the principles set forth in the Convention concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (Convention 100), as well as in the Discrimination (Employment and Occupation) Convention of 1958 (Convention 111);
- Provision of equal opportunities, inclusivity and diversity for employees;
- Provision to employees of social guarantees in accordance with the requirements of the legislation of the Republic of Kazakhstan;
- Formation of a corporate culture based on the mutual respect of employees, the absence of social prejudices and cultural barriers;
- Provision of a decent, safe and comfortable working environment in which every employee feels respected, accepted and heard, possesses the necessary powers and rights for the performance of official duties;
- Encouragement of transparency in labour relations, helping all employees to develop and build a career, providing support and creating conditions for professional growth;

- Aspiration to form diverse teams and the promotion of initiatives on the development of diversity, including the priority hiring of personnel from among the local population, as well as the targeted hiring of personnel.

The Policy extends at Kazakhtelecom JSC among employees, shareholders, clients and other stakeholders.

The Company ensures equal opportunities for its employees in the processes of selection, hiring, assessment, promotion, development, training and the provision of compensations.

At the Company, a Collective agreement is in effect, which is based on the principles of social partnership and contributes to interaction between employees and the Company. It is aimed at enhancing the efficiency of work and the protection of the social and labour interests of employees. The collective agreement determines the general positions of the parties on the regulation of social and labour relations, conditions of remuneration of labour, employment, as well as social guarantees and benefits. The Company participates in negotiations with employees on the conclusion, change, supplementation of the collective agreement, observes the periods of conducting negotiations and ensures the work of the corresponding joint commissions, provides information necessary for conducting negotiations. The Company strictly fulfils the conditions of the collective agreement. According to labour legislation, any employee has the right to participate through his representatives in collective negotiations and the development of the draft collective agreement, as well as familiarisation with the signed collective agreement.

Kazakhtelecom JSC ensures equal opportunities in the level of wages regardless of position and gender affiliation. The level of average monthly wages of the Company does not depend on the position occupied by the employee and is determined in accordance with the rules of remuneration of labour at the organization. For more on the Company's approach to the remuneration of employees and key results of 2025, read in the section "Relations with employees".

## GRI 406-1

The Company monitors the non-admission of discrimination on any grounds and the provision of a fair and equitable approach to remuneration. Facts of discrimination for the reporting period at Kazakhtelecom JSC have not been registered.

In the reporting period, within the framework of the project of the United Nations Development Programme “Sustainable development through the promotion of environmental justice and responsible business practices”, at the Company a diagnostics of the policy and procedures in the area of human rights and human rights due diligence was conducted, the results of which are used for the further development of corporate approaches in this area.

In October 2025, the Centre for Social Interaction and Communications conducted an analysis of internal regulatory and organizational-management documents of the Company in respect of compliance with the principles of gender equality. Based on the results of the analysis, the development of gender-sensitive policies and procedures aimed at strengthening gender balance and the formation of an inclusive corporate environment is planned.



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## cases

of discrimination in 2025 A\*

\* Table 59. Cases of discrimination in 2025 (the information is presented in graphical form).