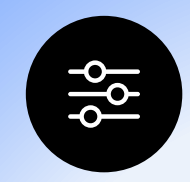


4.4. Sustainability Report: G Aspect



293.4

KZT billion

total amount of dividends paid in 2025

Key indicators for 2025

99.7%

share of procurement from local suppliers in 2025

About ~9 thousand

DDoS attacks repelled

75%

of employees

completed anti-corruption training

More than >7 million

fraudulent calls

blocked

0

incidents

in the area of information security

Key events of 2025

The first inspection audit for compliance with the requirements of the national standard ST RK ISO 37001 was conducted.

4.4.1. Anti-corruption

According to the results of the materiality analysis disclosed in section “[Materiality analysis](#)”, anti-corruption is regarded as part of a single material topic “Corporate ethics and anti-corruption”. Upon the determination of materiality, the Company took into account the results of interaction with stakeholders, questioning, internal expertise, and also the potential impact of the topic on the sustainability of business, corporate governance and long-term value creation.

For Kazakhtelecom JSC, anti-corruption is of material significance with account for the scale of activities, the significant volume of procurement and contractual relations, interaction with state bodies, suppliers, contractors, clients, shareholders and

partners. Insufficient control of corruption risks may affect the trust of stakeholders, the transparency of procurement, the Company’s reputation, legal sustainability and the effectiveness of implementation of strategic projects. Therefore, the Company regards the anti-corruption system as one of the key elements of reliable corporate governance and the protection of long-term value.

The Company follows the principles of integrity, transparency and responsibility. Kazakhtelecom JSC and Subsidiaries, as well as all their employees are obliged to comply with the requirements of anti-corruption legislation of the Republic of Kazakhstan and the principles of ethical conduct of business.

4.4.1.1. Management approach

GRI 3-3

At the Company, the Compliance Service continues to function effectively. The main task of the compliance subdivision is the prevention and identification of violations of anti-corruption legislation and internal documents of Kazakhtelecom JSC.

The Compliance Service pays particular attention to issues of ethics, corporate behaviour and the prevention of cases of humiliation or discrimination of employees by managers both at the Company itself and at its subsidiary organizations. Upon the identification of such violations, the Compliance Service takes necessary measures to bring unfair managers to responsibility. In this work, the compliance subdivision interacts with the Board of Directors, the Chairman of the Management Board of the Company and the senior management of subsidiary organizations.

GRI 2-23

At the Company, the following internal documents regulating anti-corruption compliance procedures have been introduced:

- Anti-corruption Policy (updated in December 2024).
- Policy of notification of alleged unethical/unlawful actions.
- Policy on the settlement of conflicts of interest.
- Code of Business Ethics.
- Corporate Governance Code.

The documents can be reviewed on the Company’s website telecom.kz in the “Compliance” section.

GRI 205-1, 205-2

Anti-corruption at the Company is based on the following main principles:

- legality of the Company’s activities;
- publicity and openness of the Company’s activities;
- cooperation in the area of anti-corruption activity with state bodies, as well as partners and clients of the Company;
- protection and encouragement of persons providing assistance in anti-corruption;
- adherence of Officials and Managers to the principles of anti-corruption envisaged by this Policy, and the establishment of the “tone from the top”;
- inevitability of punishment for the commission of corruption offences.

4.4.1.2. Anti-corruption activities in 2025

The main directions of compliance work in the sphere of anti-corruption in 2025 were:

- conducting the first inspection audit at Kazakhtelecom JSC on compliance with the standard ST RK ISO 37001 “Anti-bribery management system. Requirements and guidance for use”;
- conducting an internal audit of the anti-bribery management system (ABMS);
- internal analysis of corruption risks;
- training of employees;
- feedback channels;
- interaction with Subsidiaries.





Table 70. Number of employees by categories who underwent training on issues of anti-corruption in 2025 ^A

GRI 205-2

Employee category	Persons	Share, %
Total number of members of key corporate governance bodies (Board of Directors, Management Board) who completed training	4	57
Total number of employees who completed training (by category):	13,627	75
- In managerial positions	1,002	7.4
- Specialists	6,054	44.4
- Workers	6,567	48.2

4.4.1.4. Feedback channels

GRI 2-16, 2-25, 2-27, GRI 205-3

The mechanisms of reporting facts of unethical or unlawful behaviour at the Company are regulated by the “Policy of notification of alleged unethical/unlawful actions”.

At the Company, a hotline is operating — an independent, confidential and anonymous channel of communication, designed for reporting in connection with actual or potential cases of violations of legislation, including in the case of fraud, corruption, discrimination, unethical behaviour and other violations. The hotline functions through the parent company Sovereign Wealth Fund Samruk-Kazyna JSC and is serviced by an independent operator (KPMG company).

The hotline guarantees confidentiality and anonymity (at the wish of the person making the request), as well as registration and processing of 100% of requests with the subsequent provision of reports to responsible persons.

In accordance with the “Policy of notification of alleged unethical/unlawful actions”, the Company guarantees the observance of confidentiality in respect of employees, business partners and other stakeholders who reported violations at the Company, as well as the absence of prosecution and/or discrimination.

In 2025, the hotline received 81 requests (34 were confirmed).

Main topics of requests:

- violations of established procedures and legislation;
- abuse;
- labour conflicts.

81

requests

were received through the hotline in 2025

Table 71. Total number and amount of fines for cases of non-compliance with legislation and regulatory requirements, KZT million

Indicator	2023	2024	2025
Total number of cases of non-compliance with legislation and regulatory requirements, including:	-	-	-
Cases in which fines were imposed	-	-	-
Cases in which non-monetary sanctions were applied	-	-	-
Total number of fines for non-compliance with legislation and regulatory requirements paid in the reporting period, broken down:	17	22	23 ^A
Fines for cases of non-compliance that occurred in the current reporting period	-	-	-
Fines for cases of non-compliance that occurred in previous reporting periods	-	-	-
Total amount of fines for non-compliance with legislation and regulatory requirements paid in the reporting period, broken down:	12.32	16.98	18.25 ^A
Fines for cases of non-compliance that occurred in the current reporting period	12.32	16.98	18.25 ^A
Fines for cases of non-compliance that occurred in previous reporting periods	-	-	-

GRI 3-3, 2-16

The Compliance Service studies the requests and materials received through the hotline. In the presence of signs of a criminal offence, the Compliance Service forwards them for consideration to the Steering Committee on financial and economic discipline of Kazakhtelecom JSC under the leadership of the Chairman of the Management Board. The members of the steering committee make a decision on the transfer of the materials to law enforcement bodies.

Each fact registered at the Compliance Service is reflected in a quarterly report for reporting to the Board of Directors. In 2025, no critical problems arose.

On the internal and corporate websites of the Company, the contacts of the hotline and the Compliance Service are placed, through which one can report any facts of labour, corruption and other types of offences.

Feedback channels for reporting violations of the Anti-corruption Policy:

- Hotline of Samruk-Kazyna JSC
8 800 080 47 47 (Call within the RK is free of charge)
8 771 191 88 16 (WhatsApp)
- Internet portal: www.sk-hotline.kz
- Email: mail@sk-hotline.kz
- Compliance Service : 8 701 941-1001
- E-mail: Isakov.T@telecom.kz

4.4.1.5. Indicators on the material topic

Table 72. Indicators on the material topic affecting the long-term value creation of the Company

Indicator	Target for 2025	Result 2025
Conducting an internal analysis of corruption risks in the area of procurement, hiring, assessment, promotion and dismissal of employees, and other business processes	Annually	100%
Verification of distributors and service providers	Annually	736
Conducting thematic training sessions for members of governing bodies and the executive body on compliance and anti-corruption matters (including with the involvement of an external training provider)	Annual conduct	Conducted in December 2025
Passing of certification under the ISO 37001 standard (Anti-Bribery Management System).	Conducted in 2025	Certification successfully passed

The above-indicated indicators on the topic “Corporate ethics and anti-corruption” are included in the KPIs of the Head of the Compliance Service. The fulfilment of KPIs is taken into account in the variable part of his remuneration in the order established by the internal documents of the Company.

Plans for 2026 and the medium term

- Organization and conducting of training events on issues in the area of compliance.

- Ensuring the timely identification and settlement of conflict of interest.
- Ensuring the consideration of 100% of requests transmitted through the line of confidential informing.
- Conducting the second inspection audit of the Company under the standard ST RK ISO 37001 “Anti-bribery management system. Requirements and guidance for use”.
- Conducting an internal audit of the anti-bribery management system (ABMS).
- Conducting an internal analysis of corruption risks.

4.4.2. Economic performance

4.4.2.1. Management approach

GRI 3-3

The economic component of the activities of Kazakhtelecom JSC plays an important role in strategic planning, both for the Company itself and for the economy of the state. It is aimed at the enhancement of the long-term value of the Company for shareholders and investors, which is one of the strategic priorities of the Company.

Being the largest telecommunications operator of the Republic of Kazakhstan, the Company strives to make a substantial contribution to the modernization and diversification of the economy of the country and contributes to the sustainable development of local communities.

GRI 201-1

Kazakhtelecom JSC strives to make a substantial contribution to the socio-economic development of the regions of its presence.

Direct economic value is created by the Company through main activities that bring income. The distribution of the economic value created occurs in the process of payments of wages to employees, payments of dividends to shareholders, as well as taxes and other payments in favour of the state; the carrying out of procurement of goods and services and voluntary social investments. For more on this, read in the sections “Relations with employees” and “Local communities”.

In 2025, Kazakhtelecom JSC took a decision on the payment of record dividends based on the results of 2024, which ensured significant receipts to the budget of Kazakhstan, taking into account the high share of the state in the Company’s capital. At the same time, the value of shares exceeded KZT 43 thousand and S&P Global Ratings upgraded the rating of the company on the national (Kazakhstani) scale from kZA+ to kZAA-, improving the outlook to the level “Stable” and

confirmed the long-term credit rating at the BB level. The Company strives to maintain a balanced approach to the distribution of profit, combining the fulfilment of obligations to shareholders with investments in the modernization of infrastructure, the development of new technologies and the long-term growth of business.

In the reporting period, the economic value distributed by the Company exceeded the economic value generated for the year, mainly due to the declaration and payment of dividends on ordinary and preferred shares in significant volume. As a result, the “Economic value retained” indicator under the GRI 201-1 standard disclosure was formed with a negative value. This deviation is conditioned by the adopted dividend policy and the shareholders’ decisions on profit distribution, and does not reflect a deterioration in the Company’s operating or financial performance.