

4.4.3. Procurement practices

4.4.3.1. Management approach

GRI 3-3

Kazakhtelecom JSC builds interaction with suppliers on the principles of transparency and integrity. The Company strives to cooperate only with honest, reliable and transparent partners.

The Company supports the state policy on the development of domestic producers of goods, works and services in the conditions of innovative development of the national economy.

Key priorities of the procurement activities of Kazakhtelecom JSC:

- transparency and openness of procurement;
- competition upon the conduct of procurement procedures;
- support and development of local suppliers.

The procurement activities of Kazakhtelecom JSC are regulated by the “Procurement Procedure of SWF Samruk-Kazyna JSC”, the new version of which was adopted in August 2025.

The tool of management of procurement processes is the Information system of electronic procurements of the Fund. The Information system of electronic procurements of Samruk-Kazyna JSC — a single portal in which the possibility is envisaged of downloading the Plan of procurements of goods, works and services, and also the full maintenance of procurement procedures — from the conducting of procurements and the conclusion of contracts to the delivery of goods to the warehouse, the registration and signing of certificates of acceptance

and transfer of goods, certificates of performed works (rendered services), as well as the uploading of various reports. More can be reviewed on the portal zakup.sk.kz.

The Company takes measures aimed at the achievement of established KPIs on the share of in-country value: 19 offtake contracts were concluded in the amount of KZT 2.3 billion, and also the volume of contracts concluded with domestic commodity producers. Meetings-round tables are held with commodity producers, potential offtakers, within the framework of which the available opportunities and advantages are explained.

To Samruk Kazyna Contract LLP, applications are sent on a regular basis for the updating of the need for inclusion in the import substitution goods pool. In 2025, the Company sent applications in the amount of KZT 0.119 billion.

For goods in works, monitoring of commercial proposals of suppliers is carried out on a regular basis. For the reporting period, a verification of all procurements of construction and installation works for which estimate, project, project (project-estimate) documentation is available was conducted. Based on the results of the verification, commercial proposals from domestic commodity producers to suppliers were absent.



4.4.3.2. Improvement of the procurement system

Procurement procedures at the Company are conducted in the following ways of procurement: open tender, request for quotations, single source, special procedure.

At the Company, the automated system of submission of requests (Procurement Monitoring of Kazakhtelecom JSC) continues to operate.

In 2025, on the basis of the information system “Procurement Monitoring” within the framework of the implementation of the “Smart Supply” project, the development of the additional module “Contract Monitoring” was successfully completed. The developed “Contract Monitoring” module automated the following processes:

- collection and consolidation of all data on expense contracts (electronic, paper, basic procedure) for all branches of the Company;
- the process of creation, coordination and approval of drafts of expense contracts of the Company;
- the process of formation of reporting and analysis of data on all expense contracts of the Company;
- the process of centralized control and management of contracts of the Company.

Changes aimed at the support of domestic commodity producers (DCPs):

- preferences and benefits are provided to actual DCPs of the procured goods. The application-declaration on the basis of which previously DCPs not producing the procured goods could participate in procurements in the presence of production of similar goods has been excluded. In this case, there were facts and substantial risks of deliveries of goods not of own production or goods not corresponding to the customer’s technical specification;
- suppliers under routine preventive maintenance were obliged to procure goods from DCPs (in the presence on the web portal of procurements of the Fund (ISEP) of commercial proposals from DCPs);
- upon the growth of the cost of raw materials by more than 10% and/or tariffs, a revision of the amount of the contract with DCPs is possible;
- from the introduction of security (application, advance), only organizations of disabled persons producing the procured goods are exempted (previously individual entrepreneurs-disabled persons were also exempted).

4. Sustainability report

- From 1 January 2026, the Register of Kazakhstani Commodity Producers (RKCP) was introduced. The RKCP is kept in accordance with the Rules of keeping the register of Kazakhstani commodity producers, approved by order of the Ministry of Industry and Construction of the Republic of Kazakhstan of 27 August 2025. A full transition to the use of this register as the sole source of confirmation of the status of a domestic commodity producer is envisaged. At the same time, the certificate of origin of goods of the “ST-KZ” form and the industrial certificate from the indicated date lose their legal force and are not subject to application. The new RKCP does not provide for UNS GWS codes; the confirmation of the status of a domestic commodity producer is carried out on the basis of an extract from the Unified register formed by the authorised body in the area of state stimulation of industry.

With the aim of unification of procurement procedures, as well as the exclusion of duplication of functions, from 1 January 2026 the register of organizations of disabled persons of the Fund is put to loss and the register of organizations of disabled persons applied in state procurements is used, by the integration of the ISEP of the Fund with the information system of state procurements. At the same time, the principles of conducting procurements among organizations of disabled persons that are producers of procured goods have been preserved.

Changes aimed at the development of procurements by means of the Electronic Store (ES):

- procurements included in the register of trusted software and products of the electronic industry (RTSP) have been transferred from the way of request for quotations into the ES without limitations on amount. The necessity of these changes is conditioned by systematic problems related to the deliveries of low-quality goods from the RTSP or goods not of own production, including with account for the absence of additional qualification requirements for potential suppliers upon procurements by the way of request for quotations. The MAIDD RK officially supported the introduction of the RTSP into the electronic store;

- in the ES, the inclusion in the List of unreliable potential suppliers (suppliers) of the Fund in the case of non-fulfilment or improper fulfilment of the public offer on the procurement of goods in the presence of a court decision is envisaged. For 2024–2025 in the ES of 39,734 orders 2,638 were terminated in connection with the non-fulfilment by suppliers of their obligations;
- the periods of signing the offer and further actions after unsuccessful procurements in the ES are regulated.

In connection with the implementation in 2025 of the integration of the ISEP with the State database of legal entities and individuals, the necessity of the provision by potential suppliers of information about relatives has been excluded.

In addition to the ISEP, the Unified Procurement Platform of the Republic of Kazakhstan has been introduced. From 1 January 2025, the new Law of the Republic of Kazakhstan “On state procurements” was put into effect, one of the aims of which became the creation of a unified procurement platform combining all types of regulated procurements: state procurements, procurements of subjects of the quasi-state sector, procurements of the Fund, as well as other types of procurements. The unified procurement platform is created on the basis of the Centre for Electronic Finances JSC and is integrated with the current systems goszakup.gov.kz, zakup.sk.kz and mitwork.kz, as well as with more than 20 state information systems. The launch of the unified platform ensured transparent, convenient and unified access to all types of regulated procurements. According to the international study Global Data Barometer, the procurement system of Kazakhstan takes 3rd place in the world by the level of accessibility and transparency.

Kazakhtelecom JSC strives to select suppliers whose activities comply with the Company’s requirements in the sphere of environmental protection, industrial safety and observance of human rights.

Kazakhtelecom JSC by 2032 plans to improve the procurement management system and to assess its suppliers by ESG criteria.

4.4.3.3. Results of procurement activities in 2025

1,829
suppliers in 2025

Main types of goods/services:

- software and hardware complexes
- “turnkey” construction works
- telecommunications equipment
- maintenance of telecommunications equipment
- SORM services and other types of telecommunications services



Share of expenses on local suppliers

GRI 2-6, GRI 204-1

Kazakhtelecom JSC attaches particular significance to cooperation with local suppliers, preferring to procure goods and services from them. In its activities, the Company follows the state policy aimed at the development of local content in the conditions of innovative development of the national economy.

With the aim of enhancing the share of local suppliers in the Company’s procurements, on the basis of the “Telecom Komplekt” Directorate, a local project office on import substitution is functioning, aimed at work on instructions of authorised state bodies on issues of procurements and import substitution, as well as on interaction with the Central Project Office of Sovereign Wealth Fund Samruk-Kazyna JSC. In addition, annually the Authorised body on issues

of procurements of the Fund determines target performance indicators on the increase of the share of local goods, works and services in procurements.

Targeted support of domestic commodity producers is also provided by the category mechanism of management of procurements introduced in the Samruk-Kazyna Fund and managed entities (incl. at Kazakhtelecom JSC). For more — read on the site zakup.sk.kz.

99.7%

local supplier procurement share in 2025
(1,824 local and 5 foreign companies)

92

KZT billion
procurement budget from local suppliers in 2025

Table 75. Expenses on local* suppliers

GRI 2-6, GRI 204-1

Indicator	2023	2024	2025
Total number of suppliers, number	2,838	2,070	1,829 A
Total volume of procurement, KZT billion	211	79	93 A
Total number of local suppliers, number	2,792	2,063	1,824 A
Total volume of procurement from local suppliers, KZT billion	167	77	92 A
Share by number, %	98.3%	99.6%	99.7% A
Share by volume, %	79.1%	97%	98.9% A

* — residents of the Republic of Kazakhstan, established in the territory of the Republic of Kazakhstan. In accordance with the requirements of the standard GRI 204-1, by “local suppliers” are understood all suppliers that have made deliveries on the basis of invoices and contracts, regardless of whether they are producers or intermediaries. Accordingly, within the framework of the indicator all such suppliers are taken into account, including suppliers within the corporate group

The geographic definition of “local” and the main place of carrying out of activities of Kazakhtelecom JSC implies the country of presence of the Company — the Republic of Kazakhstan.

Main requirements for suppliers

The requirements of Kazakhtelecom JSC for suppliers are documented in the “Procurement Procedure of SWF Samruk-Kazyna JSC”, and are also published on the portal of the Information system of electronic procurements of the Fund.

4.4.3.4. Feedback from suppliers

The Company uses various feedback tools with suppliers, including: official correspondence by means of a paper/ electronic letter; communication through the official page of the Company on Facebook; technical support service on the procurement portal; direct line on the collection of complaints and applications on issues of procurements.

The Company annually conducts offline/online conferences with current and potential suppliers. All proposals and recommendations coming in during such conferences, Kazakhtelecom JSC systematises for the further improvement of the procurement management system.

The main feedback channels include:

- Technical support of the procurement portal: +7 (7172) 55 2266, support2@skc.kz
- Direct line on the collection of complaints and applications on issues of procurements: 8 (727) 226 82 61

- WhatsApp: +7 701 428 58 15, vopros@telecom.kz

In 2025, 215 letters/requests/proposals were received from potential and current suppliers, including 68 — through the platform.

The main topics of the letters were related to:

- participation in the tender;
- passing of the preliminary qualification selection (the process of assessment of potential suppliers for compliance with qualification requirements for procured goods, works, services).

Answers to these and other questions are published on [the official page of the Company on Facebook](#).