

4.4.4. Markets and competition

4.4.4.1. Management approach

GRI 3-3

The approach to the management of anti-competitive behaviour at the Company includes a combination of legal, ethical and strategic measures. One of the fundamental legislative acts of the Republic of Kazakhstan by which Kazakhtelecom JSC is guided is the Law “On natural monopolies”.

The Company is included in the republican section of the State register of subjects of natural monopolies and performs the functions of an operator of “universal services”, in connection with which its activities are subject to regulation from the state.

The activities of Kazakhtelecom JSC in the sphere of tariff regulation and compliance with legislation on natural monopolies are carried out under the control of the Agency for Protection and Development

of Competition of the Republic of Kazakhstan as the authorised body in the sphere of regulation of natural monopolies and protection of competition. The powers in the sphere of antimonopoly regulation and protection of competition in respect of the Company are also exercised by the Agency for Protection and Development of Competition of the Republic of Kazakhstan.

Sectoral regulation of activities in the sphere of communications, including licensing, distribution of radio frequency spectrum and technical supervision, is carried out by the Ministry of Artificial Intelligence and Digital Development of the Republic of Kazakhstan through the Committee of Telecommunications. Issues of cyber and information security are supervised by the Committee of Information Security at the ministry.

GRI 2-27, GRI 206-1

For the reporting period, no cases related to violation of antimonopoly legislation and other legal actions in respect of the Company in connection with hindrance of competition have been registered at the Company.

Table 76. Cases of violations of antimonopoly and competition legislation in 2025, pcs. A

Area of focus	2025
Total number of confirmed cases of anticompetitive behaviour	0
Total number of violations of antimonopoly and competition legislation	0

4.4.5. Information security and data protection

According to the results of the materiality analysis disclosed in section “Materiality analysis” , information security and data protection have been recognized as one of the material topics of Kazakhtelecom JSC. Upon the determination of materiality, the Company took into account the expectations of stakeholders, the results of questioning, internal expertise, and also the impact of the topic on the resilience of digital infrastructure, the quality of services, the trust of clients, regulatory compliance and long-term value creation.

For Kazakhtelecom JSC, this topic is of material significance with account for the role of the Company as a national communications operator, the scales of processing of client and corporate data, the development of digital services, AI solutions, data centres and network infrastructure. An insufficient level of information security may lead to the disruption of continuity of services, data leakage, regulatory consequences, reputational losses and the reduction of trust of clients, partners and state bodies. Therefore, the Company regards information security and data protection as one of the key factors of sustainability of business and long-term value creation.

4.4.5.1. Management approach

GRI 3-3, 418-1

The Information Security Service is in direct subordination to the Managing Director for Information Security, to whom the Head of the Information Security Service is accountable, which ensures the control of issues of information security at the strategic and operational levels.

Issues of the functioning of the information security system are submitted for consideration of the Audit

and Sustainability Committee under the Board of Directors. The Committee considers key issues related to the management of information security risks, the protection of personal data, the results of monitoring and inspections, the fulfilment of measures on the development of the information security system, as well as compliance with the requirements of legislation and IRDs of the Company. The consideration of these issues at the level of the Committee strengthens the supervision from the Board of Directors and makes it possible to take into account information security risks in the making of management decisions. Reporting on key risks, incidents in the sphere of IS and the implementation of measures is submitted to the Audit and Sustainability Committee on a regular basis in accordance with the internal procedures of the Company.

The main internal documents regulating issues in the area of information security are:

- Information Security Policy.
- Policy on the protection of personal data at Kazakhtelecom JSC.
- Concept on information security.

The documents of the Company regulating issues in the area of information security can be reviewed on the company’s website in the “Sustainable development” section, the “Information security and data protection” subsection.

Main principles of ensuring information security:

- fulfilment of legislative norms;
- involvement of senior management of the Company in the process of ensuring IS;
- orientation to business;
- process approach;
- integrated use of organizational and technical protection measures;