



UST-KAMENOGORSK TITANIUM AND MAGNESIUM PLANT JSC

Code of conduct for employees and business partners of UKTMP

K TMK SMPK-01-R1

Put into effect	Order No. 136 dd. 25.08.2021
Effective since	Date of order or indicate date put into effect
Replaces	K TMK SMPK-01-R1 UKTMP JSC Business Partnership Code
Valid through	Until replaced by new revision

Ust-Kamenogorsk

Contents

Message of President of Ust-Kamenogorsk Titanium and Magnesium Plant JSC	3
1. Responsibility for compliance with the Code.....	4
2. Business ethics of UKTMP employees	4
2.1 General provisions.....	4
2.2 Code of conduct	4
2.3 Responsibilities of managers at all levels	4
2.4 Labor practices	4
3. Communication	5
3.1 Use of communications	5
3.2 External communications and information transparency.....	5
4. Information security	5
4.1 Information security. Cybersecurity	5
4.2 Personal data protection.....	5
4.3 Information about business partners	5
4.4 Protection of intellectual property and confidential information	5
5. Compliance with Anti-Corruption Policy	5
5.1 Preventing Corruption and Bribery	5
5.2 Conflicts of interest.....	5
5.3 Limitations of joint work of close relatives, spouses and in-laws	5
5.4 No Gifts	6
5.5 Charitable donations and sponsorships	6
6. Business partners.....	6
7. Creation of trusting relationships with business partners of the plant	6
7.1 Business relationships with customers	6
7.2 Business relationships with suppliers and contractors.	6
7.3 Consultants, agents and other persons representing the interests of the plant.....	7
7.4 Obligations of UKTMP against business partners	7
7.5 Expectations of UKTMP from business partners	7
7.6 Active, fair and open competitiveness	7
8. Quality assurance	8
9. Compliance with Anti-Corruption Policy	8

Ust-Kamenogorsk Titanium and Magnesium Plant JSC President's address

Dear Colleagues and Partners!

Year by year Ust-Kamenogorsk Titanium and Magnesium Plant JSC (hereinafter referred to as UKTMP JSC, the Plant or UKTMP) hits a new peak. Level of responsibility to shareholders, the state, employees of the Plant, business partners and society is growing.

For further growth it is necessary to maintain the highest standards of ethical conduct in our business and with business partners.

Corporate culture of UKTMP involves promoting and complying with strict business ethics, as well as doing business in compliance with applicable laws and regulations.

We consider that ethics and compliance with regulatory requirements is necessary for trust and satisfaction of concerned parties of UKTMP. We value culture of personal and professional integrity, which in combination with regulations and expectations creates basis for sustainable development of the Plant.

Everything we do today is oriented towards sustainable development of the business, and in this regard the Code is designed to assist employees and partners of the Plant with understanding of ethical values of UKTMP.

Code of conduct for employees and business partners of UKTMP (hereinafter referred to as the Code):

- extends commitment of the Plant to rules of transparency and good business practice;*
- is used in all areas of the Plant's activity in the relationship of employees both among themselves and with business partners of UKTMP, representatives of government authorities and society.*

Employees and business partners of UKTMP undertake to comply with the rules and provisions set out of the Code.

*President of UKTMP
Assem Mamutova*

1. Responsibility for compliance with the Code

The provisions of this Code are mandatory for all employees and business partners of UKTMP. Responsibility for the implementation of the provisions set forth in this Code lies with the employees and business partners of the Plant.

The plant declares zero tolerance for corruption. Employees and business partners can report any violation of the provisions of this Code via the **Hotline**: by phone +7(701)057-10-20 with available WhatsApp and by e-mail Antikorr.uktmp@gmail.com. All messages are received and reviewed confidentially, but they should not be anonymous.

Employees of the Plant who violate this Code are subject to disciplinary responsibility.

In no event the Plant should take repressive measures against employees, who reported ongoing or expected violation of this Code.

2. Business ethics of UKTMP employees

2.1 General provisions

When performing their roles and responsibilities, official and employment duties, as well as during person-to-person interaction employees of the Plant are guided by provisions of the Code based on high standards of personal behavior adopted in society.

2.2 Code of conduct

Code of conduct of the employees of the Plant is based on a sense of responsibility in the performance of their function, official and employment duties and compliance with the rules determined by K-TMK-17-01 Corporate Code of UKTMP.

UKTMP employee ensures transparency, legality and fairness of decision-making, and also the employee opposes actions that damage the interests of the Plant, hinder or reduce the efficiency of the functioning of its divisions.

Employee of the Plant does not allow any unfair behavior that could harm the reputation of the Plant, or could involve illegal or questionable, from the point of view of business ethics, activities.

Each employee treats the property of the Plant with care, ensuring its safety, rational and efficient use.

The management of the Plant undertakes to provide equal opportunities for employees in terms of employment, remuneration, promotion, training, retraining, internships and other working conditions. The Plant makes personnel decisions based on professional qualities and merits in accordance with the labor legislation of the Republic of Kazakhstan and internal documents of UKTMP.

UKTMP rails against insults and humiliations of the employees of the Plant and business partners in any form.

2.3 Responsibilities of managers at all levels

Managers of the structural divisions of the Plant assist employees in understanding and applying the provisions of this Code, and also demonstrate by their own example the values set forth in this Code. The managers are obliged to promptly respond to reports of violations of the Code and monitor compliance with the rules of this Code.

2.4 Labor practices

Labor practices at the Plant are determined by the labor legislation of the Republic of Kazakhstan and are enshrined in the Collective Agreement of UKTMP.

The plant opposes the use of child and forced labor.

The UKTMP also prohibits:

- restriction of the rights of UKTMP employees provided for by the labor legislation of the Republic of Kazakhstan;
- provision of advantages in the implementation of labor rights of workers depending on gender; nationality; age; citizenship; race or ethnicity; language; religion; property and official status; living place; affiliation with public associations; pregnancy; as well as other circumstances not related to the professional qualities of the employee and the results of his/her work.

3. Communication

3.1 Use of communications

The plant provides employees with communications for official use only.

The employees are prohibited from using communications / communication systems of UKTMP for:

- watching, receiving or sending materials that may be offensive to other employees of UKTMP;
- transmission of messages of inappropriate or obscene content to third parties.

3.2 External communications and information transparency

The plant adheres to information transparency about activities for shareholders, employees of the plant and other persons.

The plant uses all available sources of information (Internet, print media, press conferences, TV and radio broadcasting, etc.) for free access of all interested parties to the disclosed information about the plant.

Employees of UKTMP engaged in public disclosure of information on behalf of the plant must ensure the completeness, objectivity, accuracy and timeliness of information disclosure.

4. Information security

4.1 Information security. Cybersecurity

All information received or acquired by the plant is protected from accidental or intentional unauthorized alteration, disclosure, destruction or disruption of accessibility.

This approach extends to the use of social media by employees. UKTMP employees are responsible for diligent use of social networks when publishing opinions and feedback on the activities of the plant.

4.2 Personal data protection

The plant takes appropriate measures to protect personal data in accordance with the legislation of the Republic of Kazakhstan and internal documents of UKTMP.

4.3 Information about business partners

Employees of the plant do not discuss and / or do not disclose information about business partners of the plant, both inside and outside the plant, unless they have the appropriate authority to do so.

UKTMP ensures protection of personal data of its employees and business partners, complies with the assumed obligations to protect confidentiality in accordance with the requirements established by the applicable law of the Republic of Kazakhstan.

4.4 Protection of intellectual property and confidential information

UKTMP protects its intellectual property, including industrial designs, technologies, software, database rights and trademarks. Intellectual property gives UKTMP a competitive advantage and is protected in accordance with the law of the Republic of Kazakhstan.

UKTMP respects the intellectual property rights of its business partners and uses it only within the scope of contracts.

The information of the plant, which is confidential, is defined in the document: P TMK 11-01 "Regulations on protection and use of confidential information at Ust-Kamenogorsk Titanium and Magnesium Plant JSC".

5. Compliance with Anti-Corruption Policy

5.1 Preventing Corruption and Bribery

The plant complies in its activities with the law of the Republic of Kazakhstan governing human rights and standards for labor protection and safety, environmental protection, prevention of corruption, ensuring fair competition, taxation and reliable presentation of financial information.

Realizing that bribery, corruption and illegal payments cause significant harm to economic security, the plant supports measures of the Kazakh and international communities to combat bribery and corruption.

5.2 Conflicts of interest

In the event of a conflict of interest, an employee of the plant is obliged to inform his manager about it. Further actions are regulated by ST TMK-SMPK-04 "Guidelines for Anti-Corruption Management System of UKTMP".

5.3 Limitations of joint work of close relatives, spouses and in-laws

At UKTMP, such situations are not allowed when:

- a relative-manager is the direct manager of a relative-subordinate;
- an employee promotes to employment of people or upgrading of employees with whom he has a family relationship, or influences the amount of salary, benefits or opportunities provided to them if they

work at UKTMP.

These provisions do not apply to working professions, where the transfer of their skills from one generation to another forms the working dynasties at the plant.

5.4 No Gifts

Receiving, as well as giving gifts, services, meals, entertainment (hereinafter referred to as the Gifts) in order to influence decision-making is unacceptable at the plant.

Any employee of the plant cannot demand or accept gifts (in cash, in the form of entertainment or other remuneration, such as free goods, works and services) or bribes from business partners from whom the employee purchases goods and services on behalf of the plant.

The only exception to this rule is the acceptance of token gifts, business meals and entertainment of small or nominal value, unless the gift or entertainment is intended to change the purchasing decision.

These issues are regulated by ST TMK-SMPK-04 "Guidelines on Anti-Corruption Management System of UKTMP".

5.5 Charitable donations and sponsorships

UKTMP does not provide financial or other support to political parties or political campaigns, as this could be perceived as an attempt to gain an undue business advantage.

Community support and donations are acceptable, whether in-kind services, knowledge or service sharing, direct financial contributions. The plant uses due diligence to ensure that charitable contributions and sponsorships are not used as bribery.

These issues are regulated by ST TMK-SMPK-04 "Guidelines on Anti-Corruption Management System of UKTMP".

6. Business partners

In its relations with partners, the plant adheres to fair, open, ethical methods of cooperation and shows respect for its business partners.

UKTMP gives customers only true information about products, services and prices.

UKTMP complies with contractual obligations. If we cannot fulfill our promises on time, then we promptly notify our colleagues and partners about this and offer possible solutions.

UKTMP avoids situations that could potentially cause a conflict of interest in relations with business partners.

7. Creation of trusting relationships with business partners of the plant

7.1 Business relationships with customers

The plant carries out its activities with all its customers equally honestly and fairly.

The plant is committed to providing customers with high quality products that meet their requirements.

The plant provides customers with detailed information about its products, including in advertisements, public statements and offers.

UKTMP employees, negotiating contracts, undertake to provide customers with the completeness and accuracy of statements, messages and presentations.

The employees of the plant do not disclose secret, confidential or proprietary information about the customer. When providing information about a project or a contract, the employees of the plant are guided by the internal regulations of UKTMP.

7.2 Business relationships with suppliers and contractors.

The decision of the plant about purchasing is based on objective assessment of reliability and integrity of the supplier or contractor, as well as overall assessment of the offer in terms of short and long term prospects and objectives.

In the interests of the plant, purchases of goods, works and services are carried out taking into account advantages in price, quality, efficiency, delivery time and compliance with the necessary requirements.

Acting as a purchaser, the plant prevents situation of dependence on a supplier or contractor, and, therefore, systematically expands the range of reliable alternatives. Relations with suppliers and contractors are governed by procedures established by the purchasing department, which aim to treat all suppliers and contractors in the same way.

The plant takes appropriate measures to avoid the occurrence of conflicts of interest and any

expressions of interest.

The plant establishes for all suppliers and contractors the requirements of strict observance of the applicable regulatory legal documents, acts related to their activities.

The plant obliges its suppliers and contractors to comply with the provisions of this Code, including compliance with human rights, child labor, occupational health and safety, ethics and compliance rules, in particular regarding anti-corruption and fair competition, environmental protection and compliance with all applicable laws and regulations.

The plant takes steps to ensure that these obligations are met both during selection process and during fulfillment of contracts.

7.3 Consultants, agents and other persons representing the interests of the plant

UKTMP uses due diligence in selecting business partners.

The plant does not conduct business with those who can undermine its reputation, therefore it excludes cooperation with business partners who intentionally and / or constantly violate the laws of the Republic of Kazakhstan.

Cooperation of the plant with business partners is not allowed in cases where:

- prohibited by applicable laws or internal documents of the plant;
- persons are included in the lists of prohibited individuals or legal entities, published by government agencies of different states.

The employees of the plant are responsible for familiarizing themselves with confidential information, basic information, reputation and standards of conduct (to the extent required by the circumstances):

- clients, potential clients;
- suppliers;
- companies and persons involved on behalf of the plant as a representative or with whom the plant works directly.

Before starting work, the employees of the plant undertake to make sure that the organizations and persons involved by the plant to represent its interests or to provide the plant with goods or services comply with the provisions of this Code.

7.4 Obligations of UKTMP against business partners

To implement the principles of interaction with its business partners, UKTMP intends to:

- Avoid corruption in relationships with business partners.
- Comply with all agreements with business partners.
- Carry out transactions with business partners openly and in a professional manner.

Inform all employees and business partners of the plant about the rules and principles of this Code.

7.5 Expectations of UKTMP from business partners

For effective work of UKTMP and compliance with the values of the plant, we expect that our business partners will:

Prevent events of corruption both on our part and on the part of the plant employees.

Observe safe working conditions and ensure environmental protection when working on the territory of the plant, namely:

- to comply with all industrial safety and labor protection rules;
- to prevent accidents and injuries of employees;
- not to allow alcoholic or drug intoxication at production sites;
- not to allow by their actions or inaction of the facts of environmental pollution.

Comply with all obligations and agreements reached.

Carry out business transactions with UKTMP on a transparent basis and at a high professional level.

Inform employees working with UKTMP about the rules and principles of this Code.

7.6 Active, fair and open competitiveness

The plant is doing business with customers, suppliers and competitors in good faith. At the same time, in order to achieve its goals, UKTMP does not use methods such as:

- manipulations,
- hiding information,
- distribution of negative information,

- misuse of undisclosed information,
- incorrect presentation of facts,

or other business fraud. The plant treats competitors, partners fairly, with respect and builds relationships in accordance with the provisions of this Code.

8. Quality assurance

The plant ensures high standards and quality of products by introducing, certifying, maintaining and improving management systems based on ISO 9001 and AS 9100 standards.

9. Compliance with Anti-Corruption Policy

The plant takes care of the environment, labor protection and safety by introducing and certifying management systems based on ISO 14001 and 45001 standards on the principles of their continuous improvement.