

| | | | | | |
|----------------|--|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| Effective Date | | 1/29 | | | |
| | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

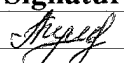
PRE-APPROVED BY
the decision of the
Strategic Planning Committee
of the Board of Directors
of E-Finance Center
Joint-Stock Company
dated June 15, 2021.
Minutes No.5

APPROVED BY
the decision of the Board of Directors
of E-Finance Center
Joint-Stock Company
dated 01.12, 2021.
Minutes No. 15

Sustainable Development Policy of E-Finance Center Joint-Stock Company

Nur-Sultan, 2021

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 2/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

1. Definitions and Abbreviations

1. The main definitions and abbreviations used in the Sustainable Development Policy of E-Finance Center Joint-stock Company are as follows:

Company means E-Finance Center Joint-stock Company

Policy means the Sustainable Development Policy of E-Finance Center Joint-stock Company;

Sole Shareholder is the highest body of the Company;

The Board of Directors is the management body of the Company;

The Management Board is the collective executive body of the Company;

employees are individuals who are in an employment relationship with the Company and directly perform work under an employment contract;

officer is a member of the Board of Directors or the Management Board of the Company;

structural unit that coordinates sustainable development activities is a part of the organizational structure of the Company that coordinates activities in the field of sustainable development;

The UN Global Compact is the largest international initiative in the field of sustainable development, which aims to introduce the ten basic principles in the field of human rights, labour relations, environmental protection and anti-corruption into the business community;

stakeholders are individuals, legal entities, groups of individuals or legal entities that influence or can be influenced by the activities of Company and its products or services and related operations due to the law or concluded agreements (contracts) or in any indirect (mediate) way; the main stakeholders are shareholders, employees, customers, suppliers, government agencies, subsidiaries and affiliates, bond holders, creditors, investors, public organizations, as well as the population of the regions in which Company operates;

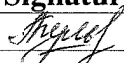
Map of Stakeholders of the Company is a tool that allows systematization and visualization of information about the Company's environment in order to develop a strategy for working with each of the stakeholders;

counterparties are individuals or legal entities that have assumed certain obligations under the contract with the Company (for example, suppliers, partners, etc.);

investors are legal entities and/or individuals making investments, investing their own, borrowed or other attracted funds in the Company's investment projects;

Trade union is a public association with a fixed membership, voluntarily created on the basis of common labour, industrial and professional interests of

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| Effective Date | | 3/29 | | | |
| | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

citizens of the Republic of Kazakhstan to represent and protect the labour, social and economic rights and interests of its members;

costumors are individuals and legal entities to whom the Company provides services in accordance with the current legislation of the Republic of Kazakhstan, the Charter and other internal regulatory documents of the Company;

suppliers are individuals engaged in business activities, legal entities (with the exception of state institutions, unless otherwise established for them by the laws of the Republic of Kazakhstan), and temporary associations of legal entities (consortia) acting as a counterparty of the Company in a public procurement contract concluded with them;

Public organizations are public associations, non-governmental organizations, etc.;

mass media include periodical printed publications, television and radio channels, documentary films, audio and visual recording and other form of periodic or continuous public dissemination of mass information, including internet resources;

precautionary principle is the principle that implies the adoption of effective measures to prevent environmental degradation and preventive actions to prevent environmental disasters, even in the absence of a full scientific justification;


The Global Reporting Initiative's Sustainability Reporting Standards (GRI Standards) are a set of standards that include 3 universal standards that apply to all organizations and include reporting principles and requirements, general disclosure elements and information about the management approach, and 33 thematic standards that contain a series of standards for the disclosure of economic, environmental and social topics;

sustainable development means the development when the Company manages the impact of its activities on the environment, economy, society and makes decisions taking into account the interests of stakeholders. Sustainable development must meet the needs of the current generation, without depriving future generations of the opportunity to meet their needs;

CGC is the Corporate Governance Code of E-Finance Center Joint-stock Company, approved by the decision of the Sole Shareholder – Order No. 1257 of the First Vice-Minister of Finance of the Republic of Kazakhstan as of November 13, 2019.

2. General Provisions

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| Effective Date | | 4/29 | | | |
| | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

2. The Policy was developed in accordance with the legislation of the Republic of Kazakhstan, the Company's Charter, the CGC and other internal regulatory documents regulating the Company's activities, as well as taking into account the requirements of the UN Global Compact, ST RK AA 1000 ARS-2010 Reporting Principles, ST RK ISO 26000-2011 Guidelines for Social Responsibility, ST RK 2063-2010 Guidelines for Reporting in the field of Sustainable Development.

3. The purpose of the Policy is to define the fundamental norms, principles, rules and approaches that Company should adhere to in building a system of governance in the field of sustainable development.

4. Policy Objectives:

1) determine the Company's activities in the field of sustainable development, including the creation of an effective and transparent system of interaction with stakeholders;

2) consolidate the roles, competencies, and responsibilities of each body and all employees of the Company for the implementation of the principles of sustainable development;

3) determine the relationship between sustainable development and key processes of the Company.

5. Solving the tasks in the field of sustainable development, the Company relies on its mission, the provisions of the Company's Development Plan and the Strategic Plan, as well as uses international norms of behaviour and principles enshrined in international standards in the field of sustainable development.


6. The Company considers the application of international standards in the field of sustainable development to be a necessary condition for ensuring compliance of its activities with the best international practices and achieving the goals and objectives in the field of sustainable development.

7. The provisions of the Policy must be observed by all employees of the Company in terms of interaction with stakeholders when planning and implementing their activities, developing internal regulatory documents, and distributing information and other types of communication.

3. Goals and Objectives of the Company in the field of Sustainable Development

8. Sustainable development of the Company is a set of principles and obligations that guide the Company in the implementation of its activities in terms of:

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| Effective Date | | 5/29 | | | |
| | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

- 1) managing relationships with stakeholders;
- 2) assessment and management of the impact on the economy, the social sphere and the environment.

9. The Company ensures the consistency of its economic, environmental and social goals for sustainable development in the long term.

10. The economic component of the sustainable development of the Company includes the following goals:

- 1) long-term value growth;
- 2) ensuring the interests of the Sole Shareholder;
- 3) improving process efficiency;
- 4) increased investment in the creation and development of better technologies;
- 5) increase in labour productivity.

11. The environmental component of the sustainable development of the Company includes the following goals:

- 1) minimizing the impact on biological and physical natural systems;
- 2) application of eco-friendly, energy- and material-saving technologies.

12. The social component of sustainable development of the Company includes the following goals:


- 1) ensuring transparent competitive equal employment procedures;
- 2) fair remuneration and respect for the rights of employees;
- 3) ensuring occupational safety;
- 4) training and professional development of employees;
- 5) implementation of internal and external social programs.

13. The objectives of the Company in the field of sustainable development are:

- 1) integration of the principles of sustainable development into the activities of the Company;
- 2) performance analysis and risk management in the context of the three components of sustainable development;
- 3) improving the quality of sustainable development management by organizing systematic work;
- 4) creation of mechanisms for effective interaction of the Company with stakeholders, including regular informing on the results of activities in the field of sustainable development.

4. Principles for Sustainable Development

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 6/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

14. The sustainable development of the Company shall respect the balance of interests of stakeholders and the principles of openness, accountability, transparency, ethical behaviour, legality, respect for human rights, zero-corruption, inadmissibility of conflicts of interest and personal example.

15. The Company supports the following principles of the UN Global Compact:

- 1) in the field of human rights protection:
 - The Company ensures and respects the protection of human rights proclaimed at the international level;
 - The Company ensures non-involvement in human rights violations.
- 2) in the field of labour relations:
 - The Company supports and recognizes the right to conclude a collective agreement;
 - The Company stands for the elimination of forced and child labour and discrimination in the field of labour and employment.
- 3) in the field of environmental protection:
 - The Company supports a precautionary approach to environmental issues;
 - The Company promotes the development and dissemination of environmentally friendly technologies.
- 4) in the field of combating corruption:
 - The Company does not tolerate all forms of corruption and other illegal activities, including extortion and bribery.

5. Interaction with Stakeholders

16. Due attention is paid to interaction with stakeholders in order to implement a successful and effective sustainable development policy in the Company.


17. The Map of Stakeholders of the Company has been developed in order to determine the list of stakeholders and the degree of their influence and spheres of influence on the interests of the Company (see Appendix to the Policy).

18. The Company defines three groups of stakeholders depending on the area of influence: the area of authority/responsibility, the area of direct influence, and the area of indirect influence.

19. Area of authority/responsibility:

- 1) Sole Shareholder;
- 2) Board of Directors;

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | |
|----------------|---|-----------------|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of 7/29 |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. |
| | | |

- 3) Management Board;
- 4) employees.
20. Direct influence area:
 - 1) Government agencies;
 - 2) investors;
 - 3) suppliers;
 - 4) customers.
21. Indirect influence area:
 - 1) population;
 - 2) public organizations;
 - 3) trade unions;
 - 4) mass media.

22. When assessing the importance of the Company's stakeholders, the stakeholders shall be ranked according to two factors: the degree of support/opposition of the stakeholder, and the assessment of the strength of its influence on the Company.

23. Based on the obtained assessment of the importance of the stakeholders, the Company's structural divisions determine the areas of interaction with the stakeholders, depending on the specifics of the activity.

24. The main methods of interaction with stakeholders are questionnaires, meetings, collective bargaining based on the principles of social partnership, joint projects, etc.

25. The Company annually sends questionnaire forms to the main stakeholders, determined by the structural unit responsible for sustainable development, in order to determine the degree of interest of stakeholders, including in issues of sustainable development, the results of which are included in the report on sustainable development.


26. The process of organizing the Company's interaction with stakeholders is based on the principle of involvement, which implies taking into account the interests of stakeholders at all stages of the Company's management process and involving stakeholders in the discussion of significant topics and important issues, potential risks and limits of responsibility.

27. In turn, engagement is achieved by following three principles:

1) essentiality. The Company clearly defines its stakeholders and is aware of which stakeholders' interests are essential.

2) completeness. In the course of its activities, the Company pays attention to the concerns of stakeholders, the needs and expected results of its activities, as well as opinions on significant issues.

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | |
|----------------|---|----------|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | 8/29 |
| | | Rev. No. |
| | | |

3) response. The Company consistently responds to all significant issues of stakeholders.

28. In order to organize the management of relations with stakeholders, the Company focuses its activities on the following basic principles:

- 1) respects and takes into account the interests of all stakeholders;
- 2) strives to actively inform the target audience about its activities;
- 3) ensures objectivity, reliability, independence and a high level of information transparency in the implementation of government programmes, certain internal procedures (procurement, competitive selection among external candidates for employment, provision of financial and non-financial services);
- 4) ensures open and productive cooperation with all stakeholders;
- 5) fulfils its obligations to stakeholders;
- 6) receives feedback from stakeholders on a regular basis.

29. When formalizing approaches to managing the impact on stakeholders, the Company proceeds from the need to comply with the requirements defined below.


30. When interacting with the Sole Shareholder and government agencies:

- 1) The Company provides reliable information on the results of financial and economic activities in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and internal regulatory documents of the Company;
- 2) The Company ensures the implementation of the rights of the Sole Shareholder within the framework of corporate governance principles aimed at effective key decision-making;
- 3) The Company provides additional information about the plans, achievements, problems of its activities, as well as research of other organizations about the Company's activities, with the exception of confidential information received from other organizations under confidentiality contracts and/or agreements.

31. When interacting with investors and suppliers:

- 1) The Company sufficiently discloses up-to-date information on its financial condition and dividend policy in accordance with the legislation of the Republic of Kazakhstan;
- 2) The Company's financial and management statements are prepared and provided in a timely manner in accordance with legal and regulatory requirements, and the financial statements are reviewed by independent auditors;

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| Effective Date | | 9/29 | | | |
| | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

3) information about the influence of the Sole Shareholder and other interested parties (national and local authorities), as well as the procedures for concluding transactions with interested parties, is transparent and accessible;

4) The Company fulfils its contractual obligations in good faith;

5) The Company ensures information transparency, openness, equality, fairness, no discrimination and unjustified restrictions on competition in strict accordance with the legislation of the Republic of Kazakhstan;

6) The Company adheres to the principles of corporate governance and improvement of the corporate governance system in accordance with the world's leading practices.

32. When interacting with customers:

1) the Company's services are available to consumers;

2) the Company ensures the security of consumer data and commercial information in order to protect their leakage and misuse;

3) the Company provides services of the same quality and the same level of service without discrimination to all groups of consumers;

4) the Company contributes to improving the quality of public service, which is reflected in improving the standards of customer service;

5) the Company informs its customers about new tools and operating principles on a regular basis.

33. When interacting with employees:

1) the Company provides open, transparent information aimed at the elaboration of qualified and motivated personnel;

2) the Company provides all employees with equal opportunities to realize their potential in the course of their work, as well as an impartial and fair assessment of their activities;

3) the selection and career development of employees in the Company is carried out exclusively on the basis of professional abilities, knowledge and skills;

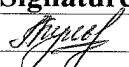
4) effective communication and interaction of employees are ensured by organizing internal corporate sources for regular informing employees and communication channels, including through the work of the corporate network, regularly studying the opinions and suggestions of employees, organizing the activities of working groups.

34. When interacting with the public (population, trade unions, public organizations, mass media):

1) the Company effectively and promptly interacts with the public;

2) the Company may participate in the implementation of socially significant projects;

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 10/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

3) responses to requests sent to the Company are provided in a timely manner and in full;

4) sponsorship and charity can be aimed at helping vulnerable segments of the population and low-income citizens, reviving national values, and supporting culture, science, and education.

6. The Company's Activities in the field of Sustainable Development. Economic, environmental and social components of sustainable development

6.1 Promoting sustainable economic development

35. The Company's mission is the digital transformation of business processes in the field of public finance to ensure transparency and accessibility of public services and the effective implementation of the functions of public authorities.

36. The Company participates in the implementation of the main socially significant, economic and environmental aspects, such as providing equal opportunities for participants in the public procurement process and reducing the use of paper to the automation of work processes, which ultimately saves budget funds, and increases the digital literacy of employees at the local level.

37. The Company primarily manages IT projects, attracts suppliers from the business side, providing equal access and opportunities to the business community, excluding the restriction of competition in the IT market.

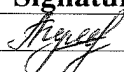
38. The Company expects its counterparties to:

1) apply the environmental risk management system to identify and assess the actual and possible impacts on the environment and society, identify and effectively implement appropriate management measures, and control the level of environmental risks;

2) implement a system of human resource management and employee health ensuring (preserving), which should be based on respect for the rights of employees, including freedom of association and the right to conclude collective agreements; this system should ensure fair treatment of employees, the creation of safe and healthy working conditions for them, the admonishment and prevention of adverse effects on the health and safety of population groups and consumers;

3) apply a system of good corporate governance based on the principles of fairness, honesty, responsibility, transparency, professionalism and competence; good corporate governance implies respect for the rights and interests of all persons interested in the organization's activities and contributes to its successful

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 11/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

operation, including the growth of its market value and maintaining financial stability and profitability.

6.2 Managing Own Environmental Impact

39. Due to the nature of its activities, the Company does not have a direct significant impact on the environment. The main resources consumed by the Company are electric power, heat and water.

40. The Company applies the principles and methods of rational use of resources that best ensure the prevention of adverse environmental impacts.

41. In its activities, the Company strives to reduce the excessive consumption of resources and minimize the existing negative environmental impact through the introduction of energy-efficient technologies, reduce water consumption, as well as reduce paper consumption for office needs through the introduction of an electronic document management system.

6.3 Responsible Labour Practices

42. Employees are the main value and the main resource. The results of the Company's activities directly depend on the level of their professionalism and safety.


43. The Company builds labour relations with its employees basing on the principle of legality and compliance with the generally recognized labour rights.

44. In carrying out its activities, the Company is guided by the principle of providing equal opportunities and does not discriminate against its employees in hiring, paying, providing access to training, promotion, dismissal on such grounds as gender, race, language, religious, political and other beliefs, citizenship, national or social origin, or physical disability.

45. Training and professional development of the Company's employees are carried out in accordance with the plan of training and professional development of employees, which is formed in accordance with the internal regulatory document describing the process of training and professional development of employees in the Company.

46. The training and professional development of the Company's employees is based on the following principles:

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 12/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

1) compliance of the topic and content of training events with the needs determined in accordance with the official duties and the goals and objectives set for employees, ensuring the improvement of the performance in the Company;

2) focus of the training events on the study of the best world practices and international standards;

3) continuity and regularity of the training and development of the employee, ensuring their professional growth.

47. The increase in the level of labour productivity of employees will be carried out through a fair and systematic assessment of activities through the use of maps of key performance indicators, personnel certification and motivational measures.

48. A regular review of wages in the market and a comparable industry will be carried out, and motivational studies will be conducted in order to ensure fair and competitive remuneration for work in the Company.

49. The Company takes measures to ensure the proper organization of employee's workplace and strives to create safe working conditions that meet the requirements of the legislation of the Republic of Kazakhstan in this field.

50. The Company documents and investigates all incidents and problems related to occupational safety and health in order to minimize or eliminate them.

51. The Company provides the necessary training for employees in the field of occupational safety and health, including training and advanced training of employees in this field.

6.4 Responsible Business Practices

52. The Company identifies corruption risks, implements and supports anti-corruption policies and practices.

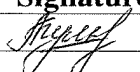
53. The Management Board and the heads of the Company's structural divisions set an example of anti-corruption behavior to their subordinate employees, as well as demonstrate commitment, encouragement and supervision of the implementation of the anti-corruption policy.

54. The Company raises awareness of its officials, employees, and contractors on issues of corruption and countering it.

55. The Company conducts internal analysis of corruption risks in accordance with the established procedure.

56. The Company operates feedback mechanisms through which officers, employees and contractors of the Company, as well as individuals and legal

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 13/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

entities can provide information about possible corruption offenses committed by any officer, employee, or representative of the Company's counterparty.

57. The Company's officers and employees are responsible for making transparent, timely and adequate decisions, free from conflicts of interest.

7. Policy Implementation Mechanisms

7.1 Allocation of Responsibility

58. The sustainable development management in the Company is carried out within the framework of the general management system of the Company's activities and is an integral part of it.

59. The Management Board of the Company ensures the formation of an appropriate sustainable development management system and its implementation.

60. On an annual basis, the Management Board of the Company approves the corresponding action plan in the field of sustainable development; the implementation of the plan is part of the report on the sustainable development of the Company.

61. The Strategic Planning Committee of the Company's Board of Directors assists the Company in the field of sustainable development by making recommendations, including questions on the development of actions that contribute to improving the Company's performance in the long term.

62. The structural divisions of the Company ensure the implementation of the action plan in the field of sustainable development within their competence.

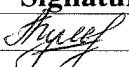
63. The heads of the relevant structural divisions of the Company are personally responsible for the implementation of the action plan in the field of sustainable development within their competence.

64. Following the appropriate written request of the structural division coordinating the Company's activities in the field of sustainable development, the structural divisions of the Company provide information for the development of the action plan in the field of sustainable development, as well as information on the results of the implementation of the action plan in the field of sustainable development, which is accordingly included in the annual report of the Company, within their competence.

65. The structural unit that coordinates the Company's activities in the field of sustainable development performs the following functions:

1) carries out planning of activities in the field of sustainable development such as analysis of the internal and external situation, definition of goals, as well as

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 14/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

targets in the field of sustainable development, actions to improve activities in the scope of three components of sustainable development (economy, environment, social issues), responsible persons, necessary resources and deadlines;

2) coordinates the activities of the Company's structural divisions aimed at achieving the goals and objectives of the Policy;

3) based on the information of the Company's structural divisions, it forms an action plan in the field of sustainable development, prepares and compiles a report on the implementation of the action plan in the field of sustainable development;

4) prepares and compiles the annual report of the Company with the inclusion of the report on the sustainable development of the Company in the form of a section on sustainable development.

7.2 Integrating the Principles of Sustainable Development into Key Processes

66. The Company integrates the principles of sustainable development into the Company's key processes, including planning, reporting, risk management, operational activities, and others, as well as into decision-making processes at all levels, starting from the executive bodies (Sole Shareholder, Board of Directors, Management Board) and ending with ordinary employees.

7.3 Decision-Making Processes

67. The decision-making process in the Company is based on the following:

1) the commitment to the principles of sustainable development is established by the Board of Directors and the Management Board;

2) the decision-making process contributes to the efficient use of financial, natural and human resources;


3) the Company provides equal gender and racial opportunities for leadership positions;

4) the Company has established processes for the two-way exchange of information with stakeholders, which helps in identifying areas for improved interaction.

7.4 Corporate Governance

68. The Company's sustainable development management system is inextricably linked to the corporate governance system.

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| Effective Date | | 15/29 | | | |
| | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

69. One of the fundamental principles of the CGC is the principle of sustainable development.

70. All employees and officers at all levels contribute to sustainable development.

7.5 Business Operations

71. The Company selects suppliers of goods, works and services on a transparent basis in accordance with the requirements of the legislation of the Republic of Kazakhstan and internal regulatory documents of the Company. This process is based on the preference for the best price, quality and terms of delivery of goods, works and services, as well as a good business reputation of the counterparty.

72. The Company is considering the possibility of including the principles of sustainable development in the relevant contracts (agreements) with counterparties to increase consistency with the goals of sustainable development.

7.6 Risk Management and Internal Control

73. The actions of the Company affect the interests of the stakeholders and may be the subject of criticism from them. Criticism of stakeholders is considered by the Company as a source of possible negative impact on its reputation. The main type of the Company's risk in the field of sustainable development is the reputational risk associated with a decrease in the level of trust of the target audience in the Company's activities.

74. The main tool for managing reputational risk is to conduct a continuous dialogue with stakeholders, including monitoring the media, reviewing appeals, conducting surveys and meetings with stakeholders.

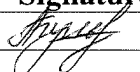
75. Other risks determined by the Company's internal regulatory documents may be considered as risks that affect the Company's long-term sustainable development.

76. In order to determine the risks in the field of sustainable development, the Company analyzes both internal and external factors affecting the Company.

77. The Company includes risks in the field of sustainable development in the Company's risk register and takes measures to minimize them.

8. Disclosure of Information in the field of Sustainable Development

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 16/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

78. The Company's Policy is open to the general public and is posted on the Company's corporate Internet website.


79. The Company regularly discloses the results of the Policy implementation to interested parties on the Company's corporate Internet website, as well as in the Company's annual report.

80. The Company's approaches to the preparation of the annual report are based on international information disclosure standards - the Global Reporting Initiative's Sustainability Reporting Standards (GRI Standards).

9. Final Provisions

81. The Company will improve the Policy taking into account changes in the legislation of the Republic of Kazakhstan and the emergence of new standards in the field of sustainable development in international and national practice, guided by the interests of the Sole Shareholder, the Company itself and other interested parties.

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | |
|----------------|---|------------------|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of 17/29 |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. |
| | | |

Appendix
to the Sustainable Development Policy
of E-Finance Center Joint-stock
Company

Map of Stakeholders of E-Finance Center Joint-stock Company

1. The map of stakeholders of E-Finance Center Joint-stock Company (hereinafter referred to as "the Map of Stakeholders of the Company") was developed in order to determine the list of stakeholders and the extent of their influence.

2. Map of Stakeholders of the Company is designed to systematize and visualize information about the Company in order to build an adequate strategy for cooperation with each of the stakeholders.

Areas and Degrees of Importance of Influence

3. Identifying stakeholders and cooperating with them is one of the tools that allow improving the business reputation of the undertaking and to establish effective and balanced relationships with all stakeholders.

4. The Company distinguishes three groups of stakeholders depending on the area of influence: the area of authority/responsibility, the area of direct influence, the area of indirect influence (Appendix 1 to the Map of Stakeholders of the Company).

5. The Map of Stakeholders of the Company allows the most adequate identification of stakeholders.


6. The main forms of interaction with stakeholders are public meetings, advisory councils, collective bargaining based on the principles of social partnership, joint projects, partnerships, etc.

7. The main areas of interaction with stakeholders include strategic planning, financial activities, project management, supply of goods, works, services, lawmaking, operational activities, interaction with the media.

The degree of importance of the influence can be estimated based on two scales x/y , where:

$x = -5 : +5$, in increments of 1 (or smaller) characterizes the degree of support/opposition to the Company's stakeholders (-5 is the most extreme degree of opposition, +5 is the highest degree of support)

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | page/of | | | |
| | | 18/29 | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | Rev. No. | | | |
| | | | | | |

$y = 0 : 5$, in increments of 1 (or smaller) characterizes the degree of influence of the stakeholder on the Company.

Identifying Interests and Developing a Strategy for Interaction

8. Information obtained in the course of constructing the Map of Stakeholders of the Company is represented in the list of spheres of influence on the Company's interests (Appendix 2 to the Map of Stakeholders of the Company) and the Table of Stakeholders' Interests and Interaction (Appendix 3 to the Map of Stakeholders of the Company).

9. A strategy for interaction with this stakeholder is developed based on the assessment of the degree of support/opposition of the Company's stakeholder.

10. Effective interaction with stakeholders shall allow:

- combining resources (knowledge, personnel, money, and technology) to solve problems and achieve goals;
- evaluating the external environment, including the development of markets, as well as identifying new strategic opportunities;
- improving business processes;
- implementing a policy of openness and transparency of activities.

11. The stakeholder importance parameter is calculated according to the formula:


$$(\pm x + y) = n$$

where: $\pm x$ is the degree of support/opposition of the stakeholder, y is the power of influence of the stakeholder, and n is the importance of the interested party.

12. The strategy of interaction with each stakeholder, as well as the instruments of influence, are determined by the structural divisions of the Company independently, basing on the specifics of their activity.

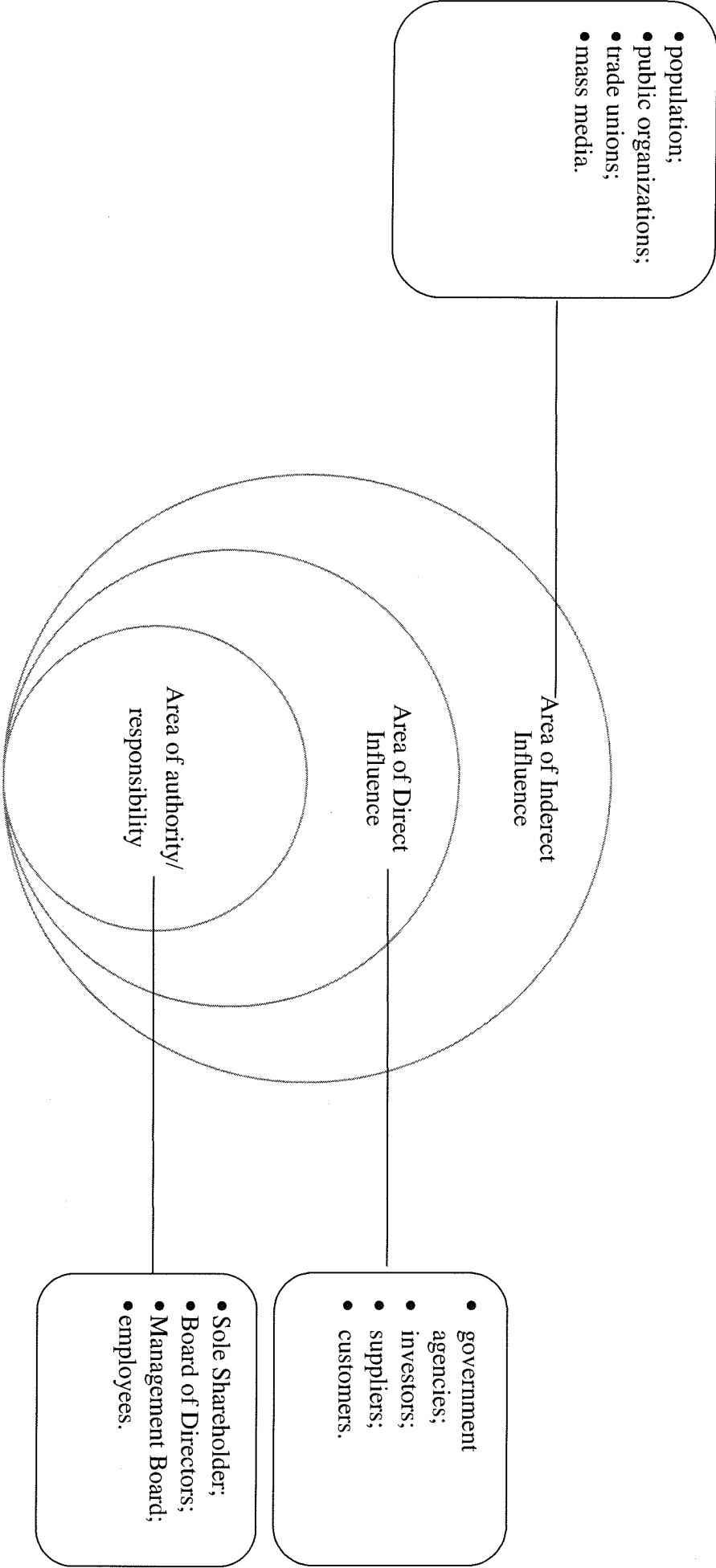
13. Values in the Table of Stakeholders' Interests and Interaction (Appendix 3 to the Map of Stakeholders of the Company) are subject to change (not static) at least once a year, depending on the implementation of the interaction strategy. The indicators of the Map of Stakeholders of the Company are updated based on changes in the indicators of the Table of Stakeholders' Interests and Interaction.

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|--|--|--|----------|
| PPD | «Электрондык каржы орталыгы» АК E-Finance Center JSC | | | | page/of |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | | | | 22/29 |
| | | | | | Rev. No. |
| | | | | | |

Appendix 1
to the Map of Stakeholders of the Company



Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|-----------|
| A. Kulmukhambetova | Chief Specialist | PPD | |

| | | | | | | |
|----------------|---|--|--|--|--|----------|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | | | | | page/of |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | | | | | 23/29 |
| | | | | | | Rev. No. |
| | | | | | | |

Appendix 2
to the Map of Stakeholders of the Company

| Stakeholders | List of areas of influence on the interests of the Company | | | | | |
|--------------------------------|--|---------------------|-------------------|-------------------------------------|-------------------|------------|
| | Areas of Influence on the Interests of the Company | | | | | |
| | Strategic Development | Business Operations | Policy Management | Project Business Management Quality | Operating Results | Reputation |
| Scope of Powers/Responsibility | | | | | | |
| Sole Shareholder | + | | + | | | + |
| Board of Directors | + | | + | | + | |
| Management Board | + | + | + | + | + | + |
| Employees. | | + | | | | |
| Direct Impact Area | | | | | | |
| Government Agencies | + | | + | | + | + |
| Investors | + | | | + | + | + |
| Suppliers | | | | | | |
| Customers | | + | | | + | |
| Indirect Impact Area | | | | | | |
| Population | | | | | + | |
| Public Organizations | | | | | | |
| Trade Unions | | | | | | |
| Mass Media | | | | | | + |

Developed by:


| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | | |
|----------------|---|--|--|--|--|----------|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | | | | | Page/of |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | | | | | 24/29 |
| | | | | | | Rev. No. |
| | | | | | | |

| | |
|---|--------------------------|
| | High degree of influence |
| | Low degree of influence |
| + | High degree of interest |

| | |
|--|--|
| Strategic Development | determination of long-term priorities, strategic directions of the Company's development through the adoption of state development programs, as well as development and approval of the Company's strategic documents; |
| Business Operations | constant daily activity to manage regular, standard processes in the Company; |
| Policy Management | adoption of regulatory legal acts that directly or indirectly regulate certain aspects of the Company's activities; |
| Project and/or Business Process Management Quality | the degree of competence and efficiency of the Company's employees and Management Board and the provision of project and/or business process management services; |
| Operating Results | quantitative performance indicators of the Company's business operations; |
| Reputation | the prevailing public opinion about the qualities, advantages and disadvantages. |

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |


| | | | | | |
|----------------|---|--|--|--|----------|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | | | | page/of |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | | | | 25/29 |
| | | | | | Rev. No. |
| | | | | | |

Appendix 3
to the Map of Stakeholders of the Company

Table of Stakeholders' Interests and Interaction

| N o. | List of Stakeholders | Degree of support/op position | Interests/reasons | Power of influence | Parameters of importance of the interested party | Influence tools | Interaction strategy |
|------|----------------------|-------------------------------|--|--------------------|--|--|--|
| 1. | Sole Shareholder | +5 | Compliance with the interests of the Company / Sole Shareholder. | 5 | 10 | Charter, CGC and internal regulatory documents of the Company. | Ensuring the exercise of the rights of the Sole Shareholder, within the framework of the principles of corporate governance, aimed at effective adoption of key decisions in accordance with the legislation of the Republic of Kazakhstan and the Company's Charter. Dividend payment. Provision of reliable information on the results of financial and economic activities in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and the internal regulations of the Company. |


Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | | | | |
|----------------|---|--|--|--|----------|--|--|--|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | | | | page/of | | | |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | | | | 26/29 | | | |
| | | | | | Rev. No. | | | |
| | | | | | | | | |

| | | | | | | | |
|----|--------------------|----|--|---|----|--|--|
| 2. | Board of Directors | +5 | General/strategic management of the Company's operations. | 5 | 10 | Charter, CGC and internal regulatory documents of the Company. | General/strategic management of the Company, except for the issues referred by the legislation of the Republic of Kazakhstan and (or) the Articles of Association to the exclusive competence of the Sole Shareholder of the Company. |
| 3. | Management Board | +5 | Management of the Company's day-to-day activities, making decisions on issues of activity not related to the competence of other bodies of the Company. Ensuring the sustainability of the Company's business. | 4 | 9 | Charter, CGC and internal regulatory documents of the Company. | Execution of decisions of the Sole Shareholder and the Board of Directors of the Company. Preparation and implementation of the Development Plan and other issues related to the Company's operations. |
| 4. | Employees | +5 | Employment relations with the employer, good working conditions, professional development, high wages. | 4 | 9 | Charter, CGC, internal regulatory documents of the Company, Labour Code of the Republic of Kazakhstan, employment contracts. | Implementation of position duties aimed at the realization of tasks and functions of the Company and protection of the Company's interests. Conducting an open, transparent, aimed at the formation of qualified (with the possibility of acquiring industry experience through the introduction of new technologies and services) and motivated HR policy. Ensuring equal opportunities for all employees to realize their potential in |


Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|--|--|--|----------|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | | | | page/of |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | | | | 27/29 |
| | | | | | Rev. No. |
| | | | | | |

| | | | | | | | |
|----|---------------------|----|--|---|----|---|--|
| | | | | | | | the course of their work, unbiased and fair assessment of their results, selection and career development of employees solely on the basis of professional abilities, knowledge and skills. |
| 5. | Government Agencies | +5 | Exercise of legislative and executive functions. | 5 | 10 | Legislation of the Republic of Kazakhstan, state programs of social and economic development. | Participation in working groups, forums, and conferences. Approval of the main activities of the Company (Sole Shareholder). |
| 6. | Investors | +3 | Investing for profit. | 3 | 6 | Memoranda, agreements, contracts. | Attracting investment for the implementation of projects and core activities. |
| 7. | Suppliers | +3 | Commercial interests. | 4 | 7 | Contracts, the Civil Code of the Republic of Kazakhstan, the Commercial Code of the Republic of Kazakhstan. | Conclusion of contracts, control over the performance of contractual relations. Compliance with the rights and interests of business entities, not to damage the environment, not to cause harm to others. Compliance with the moral principles of society, the rules of business ethics. |
| 8. | Customers | +4 | Commercial interests/Social interests. | 5 | 9 | Contracts, the Civil Code of the Republic of Kazakhstan, | Ensuring compliance with the expectations of consumers of the Company's financial/ non-financial products and services. Conclusion of contracts, control over execution. |


Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | | |
|----------------|---|--|--|--|--|----------|
| PPD | «Электрондық қаржы орталығы» АҚ E-Finance Center JSC | | | | | page/of |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | | | | | 28/29 |
| | | | | | | Rev. No. |
| | | | | | | |

| | | | | | | |
|--------------------------|----|--|---|---|---|---|
| | | | | | | Not to cause damage to the environment, not to cause harm to others. Compliance with the moral principles of society and the rules of business ethics. |
| 9. Population | +3 | Transparency of the Company's operations, creation of additional jobs. | 2 | 7 | Public opinion. Appeal to higher and regulatory authorities, the media. | Public opinion polls. Publication of financial and non-financial reports on its activities; demonstration of practical commitment to the principles of social responsibility, transparency of activities and sustainable development; striving to comply with generally accepted moral and ethical standards. |
| 10. Public Organizations | +3 | Implementation of goals and objectives of public organizations. | 3 | 6 | Contractual relations under concluded contracts. Conducting meetings, seminars, conferences, etc. | Compliance with the legislation of the Republic of Kazakhstan. Mutual agreement on general issues. Conducting joint events with associations and incorporations. |
| 11. Trade Unions | +1 | Respect and protection of employees' rights. | 5 | 6 | Labour Code of the Republic of Kazakhstan, employment contracts, regulatory acts of the Republic of Kazakhstan. | Collective bargaining based on the principle of social partnership. |


Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |

| | | | | | |
|----------------|---|--|--|--|----------|
| PPD | «Электрондык капжы опрауы» АК E-Finance Center JSC | | | | page/of |
| Effective Date | Sustainable Development Policy of E-Finance Center Joint-stock Company | | | | 29/29 |
| | | | | | Rev. No. |
| | | | | | |

| | | | | | | | |
|-----|------------|----|--|---|---|---|--|
| 12. | Mass Media | +3 | Publications and information about the Company's operations. | 3 | 6 | Publications and information about the Company's activities, organization of interviews, distribution of press releases, etc. | Organization of activities in the field of information by: communicating the strengths and opportunities of the Company to the target audience; creating a positive public opinion; ensuring the transparency of the Company's activities through reliable, regular, continuous and timely disclosure of information; presentation of the results of the Company's activities in the main areas of the Company's activities to the public. |
|-----|------------|----|--|---|---|---|--|

Developed by:

| Name | Position | Department | Signature |
|--------------------|------------------|------------|---|
| A. Kulmukhambetova | Chief Specialist | PPD |  |