POLICY
OF PROACTIVE REPORTING OF VIOLATIONS
AND PROTECTION OF INDIVIDUALS REPORTING THEM
OF AUTONOMOUS CLUSTER FUND "ASTANA HUB"

APPROVED: by Autonomous Cluster Fund "Astana Hub» Executive Committee resolution No. 214

DATE OF APPROVAL: 16.10.2026

POLICY
of proactive reporting of violations and protection of individuals reporting them of Autonomous Cluster Fund "Astana Hub"

Astana, 2026

TABLE OF CONTENTS

1. GENERAL PROVISIONS, GOALS AND OBJECTIVES OF THE POLICY…….. 3
2. GUARANTEES FOR INDIVIDUALS REPORTING VIOLATIONS……..4
3. SCOPE OF APPLICATION……9
4. NOTIFICATION AND REVIEW PROCEDURE FOR REPORTS OF VIOLATIONS……..11
5. RESPONSIBILITY AND RESPONSE MEASURES……...14
6. FINAL PROVISIONS……14
7. TERMS AND DEFINITIONS.....15

1. GENERAL PROVISIONS, GOALS AND OBJECTIVES

1.1. General Provisions

1. Autonomous Cluster Fund "Astana Hub" (hereinafter referred to as the Fund) operates on the principles of legality, transparency, accountability, good faith, adherence to business ethics, and zero tolerance for corruption and other violations.

2. The Fund ensures compliance with the requirements of the legislation of the Republic of Kazakhstan, Code of Corporate Ethics, and internal regulatory documents of the Fund. The Fund does not permit corruption, fraud, embezzlement, abuse of official powers, unregulated conflicts of interest, falsification of information, violations of business ethics, internal controls, or other mandatory requirements.

3. The Policy on Proactive Reporting of Violations and Protection of Whistleblowers (hereinafter referred to as the Policy) is an internal document of the Fund that establishes:

scope of individuals and types of violations to which the Policy applies;

channels and procedure for sending violation reports;

procedure for registering, reviewing, and verifying reports;

guarantees of confidentiality, anonymity, and protection of applicants;

prohibition of retaliatory action against applicants and procedure for considering complaints about such action;

response measures following the review of reports.

4. The Policy is developed in accordance with the legislation of the Republic of Kazakhstan, including anti-corruption and labor legislation, as well as the Fund's internal documents in areas of business ethics, anti-corruption compliance, risk management, and internal control.

5. Sending a message through the channels provided for by the Policy does not restrict applicant's right to apply to authorized state bodies, law enforcement agencies, or court to protect their rights and legitimate interests in the manner established by the legislation of the Republic of Kazakhstan.

1.2. Policy Goals

6. The Policy objectives are:

fostering culture of integrity, openness, accountability, and zero tolerance for violations within the Fund;

creation of safe, accessible, and understandable channels for reporting alleged or committed violations;

timely detection, prevention, suppression, and elimination of the consequences of violations;

protection of persons who have reported violations in good faith, from persecution and other adverse consequences;

strengthening the trust of employees, partners, contractors, and other stakeholders in the Fund's corporate governance and internal control system;

reduction of the Fund's corruption, reputational, operational, and other risks.

1.3. Policy Objectives

7. To achieve Policy's objectives, the Fund ensures:

reception, registration, preliminary assessment, and consideration of reports of violations;

ability to send messages through internal information channels, including anonymously;

confidentiality of information about the individual who reported the violation, content of the message, verification materials, and its results, except in cases provided for by the legislation of the Republic of Kazakhstan;

protection of persons who have in good faith reported violations, from dismissal, discrimination, pressure, threats, harassment, and other adverse actions related to reporting or participating in its consideration;

objective, timely, and impartial consideration of reports;

conducting internal audits and investigations in compliance with the principles of legality, independence, competence, confidentiality, and respect for the rights of all involved parties;

adoption of adequate response measures based on the results of message review;

informing the applicant about status and results of the review of the report within the limits permitted by the legislation of the Republic of Kazakhstan and confidentiality requirements;

analysis of causes and conditions that contributed to the violations, and development of preventive measures;

informing employees and stakeholders about channels for proactive reporting, guarantees of protection, and liability for knowingly false reports.

1.4. Reporting Sphere

8. Within the framework of this Policy, reports of facts, signs, or reasonable suspicions regarding violations stipulated in Section 3 of this Policy are accepted and considered, including violations of labor rights and business ethics, discrimination, harassment, psychological pressure, mobbing, bullying, and other actions or inactions that may cause damage to the Fund and its employees.

9. A report may be submitted if the applicant has reliable information, a reasonable assumption, or reasonable grounds to believe that a violation has been committed, is being committed, or may be committed. To apply the guarantees of this Policy, it is not required that the information provided in the notification be subsequently fully confirmed.

10. Communications or statements knowingly based on false information, intended to cause harm to another person, disseminate unreliable information, or abuse rights are not protected by this Policy. However, unproven nature of a report following an investigation does not in itself mean it is knowingly false.

1.5. Proactive Information Channels

11. The Fund provides an opportunity for employees, contract workers, board members, job applicants, interns, contractors, partners, suppliers, and other interested parties to report suspected violations.

12. Report or statement may be sent through the following internal proactive information channels:

to the direct supervisor;

to the anti-corruption compliance officer;

to the corporate security service;

to the supervising Managing Director;

to the internal audit service;

to General Director

through other confidential channels of proactive information disclosure, approved by the Fund, information about which is posted on the official Internet resource of the Fund.

13. Internal channels must provide for the receipt of messages in written, electronic, or oral form. Reception of oral messages is carried out upon personal application or by phone, with their content being recorded in writing by the authorized person receiving the message. If technically feasible, the Fund also accepts anonymous reports.

14. Contact details of information channels, procedure for sending messages, and their operating hours are posted on the Fund's official website and communicated to interested parties by other available means.

15. The Fund accepts and considers anonymous reports if the information contained therein is sufficient for a preliminary assessment and, if necessary, for an investigation.

16. Sending a message through internal channels does not restrict a person's right to directly apply to authorized state bodies, law enforcement agencies, or court in the manner established by the legislation of the Republic of Kazakhstan.

17. A person has the right to contact the Fund's anti-corruption compliance officer for consultation on matters of reporting, available communication channels, and protection guarantees provided for by this Policy. Obtaining such consultation is voluntary and does not restrict a person's right to submit a report or statement through the Fund's internal channels or to contact authorized government bodies.

18. The Fund ensures confidential, timely, and objective consideration of reports for the purpose of preventing violations, reducing associated risks, and protecting legitimate interests of the Fund, applicant, and other involved parties.

2. GUARANTEES FOR INDIVIDUALS REPORTING VIOLATIONS

2.1. General protection guarantees

19. The Fund guarantees protection to any person who has in good faith reported an alleged, ongoing, or completed violation through internal reporting channels or to authorized state bodies, as well as to any person who assists in an investigation.

20. Protection is granted regardless of the report review outcome, if the applicant acted in good faith and had reasonable grounds to believe that the reported information was true.

Non-confirmation of a report following an inspection is not, in itself, grounds for holding the applicant liable or applying adverse measures against them.

21. Providing protection does not exempt a person from liability for their own unlawful actions, including actions committed by them as a perpetrator or accomplice to a violation. The fact of voluntary reporting and cooperation with verification may be taken into account in cases and in the manner provided for by the legislation of the Republic of Kazakhstan and internal documents of the Fund.

2.2. Prohibition of retaliatory action

22. The Fund does not permit direct or indirect retaliation against an applicant in connection with submitting a report, participating in an investigation, or assisting

in establishment of violation circumstances.

23. No direct or indirect retaliatory measures shall be taken against persons who report a violation or assist in its review, including:

dismissal, suspension from work, refusal to conclude, non-renewal, termination or early termination of an employment, civil law or other contract, including contractual relations with a person engaged through an outsourcing company;

demotion, denial of promotion, unjustified change in job functions, place of work, working hours, working conditions, remuneration, as well as deprivation of bonuses, benefits, payments, training, professional development, professional opportunities or participation in projects;

unjustified negative assessment of activities, deterioration of recommendations or characteristics, application of disciplinary or other liability measures without legal and documented grounds;

discrimination, threats, intimidation, coercion, harassment, bullying, psychological pressure, mobbing, bullying, harassment, degrading treatment, including through social networks and other digital channels;

other actions or inaction that create adverse consequences for the applicant in connection with sending the message.

24. Any managerial, personnel, disciplinary, or other decision concerning the applicant must be based on objective, documented circumstances unrelated to report submission or participation in its review.

25. An individual who believes that retaliatory action has been taken against them has the right to contact the anti-corruption compliance officer, corporate security service, the General Director, the Fund's governing bodies, or authorized state bodies. Such a message is subject to immediate registration, independent assessment, and consideration in the manner established by the legislation of the Republic of Kazakhstan and internal documents of the Fund.

2.3. Confidentiality, anonymity, and external protection

26. Information about the applicant's identity, report content, materials and results of its consideration, as well as information about the persons being checked, are confidential information, unless otherwise provided by the legislation of the Republic of Kazakhstan.

27. Access to specified information is granted only to authorized individuals to the extent necessary for the registration, consideration, and report verification, decision-making, implementation, and monitoring of response measures.

28. Disclosure of applicant's identity is permitted only with their written consent or in cases expressly provided for by the legislation of the Republic of Kazakhstan. If disclosure of information is required by law, the Fund shall, whenever possible, provide the applicant with prior notice of grounds, scope, and recipients of information being transferred.

29. The Fund takes organizational, technical, and legal measures to prevent unauthorized access, divulgence, loss, alteration, or misuse of information obtained in implementation of this Policy. Absence of a separate confidentiality agreement with the applicant does not exempt the Fund and involved individuals from the obligation to maintain confidentiality.

30. Applicant is obliged to maintain confidentiality of information that has become known to them in connection with sending a notification or participating in

an inspection, except in cases provided for by the legislation of the Republic of Kazakhstan or necessary for the protection of their rights and legitimate interests in authorized state bodies or court.

31. Applicant has the right to apply to the authorized anti-corruption body, court, and other state bodies in the manner prescribed by the legislation of the Republic of Kazakhstan, including if they believe that their report has not been properly considered or their rights and legitimate interests have been violated.

2.4. Consideration of Labor Disputes

32. An individual labor dispute involving an individual who has assisted in combating corruption by conscientiously reporting a violation shall be considered by the Fund's Conciliation Committee in accordance with the Procedure established by the labor legislation of the Republic of Kazakhstan and legislation on combating corruption.

33. In cases provided for by the legislation of the Republic of Kazakhstan, a representative of the authorized anti-corruption body is involved in the consideration of such labor dispute. Decisions, documents, and information regarding the dispute are sent to the specified body in cases, to the extent, and within the timeframes stipulated by the legislation of the Republic of Kazakhstan.

2.5. Encouragement and responsibility

34. Encouragement of an individual who has reported a corruption offense or otherwise in good faith assisted in its detection, prevention, or suppression shall be carried out in cases and in the manner prescribed by the legislation of the Republic of Kazakhstan.

35. The Fund has the right to apply material and non-material incentives to individuals who have conscientiously assisted in identifying and preventing violations, provided that this does not contradict the legislation of the Republic of Kazakhstan, confidentiality requirements, and internal documents of the Fund.

36. Individual who submitted a knowingly false report of a violation shall be held liable in accordance with the legislation of the Republic of Kazakhstan.

Non-confirmation of information based on the results of an inspection does not in itself indicate that the report was knowingly false.

2.6. General principles for reviewing messages

37. The Fund ensures receipt, registration, preliminary assessment, and consideration of reports on alleged violations, as well as the adoption of proportionate response measures based on their results in accordance with this Policy, internal documents of the Fund, and the legislation of the Republic of Kazakhstan.

38. Based on the results of the report review, the Fund has the right to take measures to eliminate violations and their consequences, improve internal controls and processes, manage risks, train employees, as well as other measures within its competence.

39. Information on the report review results is provided to applicant if possible and to the extent that it does not violate requirements of the legislation of the Republic of Kazakhstan, inspection confidentiality, rights of third parties, rules for protection of personal data, commercial and other legally protected secrets.

3. SCOPE OF APPLICATION

3.1. Individuals to whom the Policy applies

40. This Policy applies to members of the Fund's governing bodies and collegial bodies, full-time and hired employees, employees of its branches and representative offices, the Fund's subsidiaries and affiliates, job candidates, interns, as well as individuals performing work or providing services under civil law contracts.

Provisions of this Policy also apply to the Fund's contractors, partners, suppliers, consultants, and other interested parties within the scope of obligations stipulated by concluded agreements, anti-corruption clauses, and other applicable documents.

41. Individuals referred to in paragraph 40 of this Policy are entitled to report actual, attempted, or suspected violations if they have credible information, reasonable suspicion, or reasonable grounds to believe that a relevant violation has occurred or may occur.

3.2. Subject of reports

42. Within the scope of this Policy, reports may be made regarding facts, signs, or reasonable suspicions of the following violations:

corruption offenses, including extortion, offering, promising, giving, receiving, or brokering bribes, improper remuneration, abuse or exceeding of official authority, as well as the use of official position for personal gain;

fraud, embezzlement, misappropriation, waste, unlawful write-off of funds, property, inventory, and other assets of the Fund, as well as other unjustified expenses;

non-disclosure of personal interest, lobbying for affiliated parties, granting unjustified advantages to third parties, and other violations of conflict of interest management requirements;

legalization of proceeds of crime and other suspicious financial transactions;

violations of the legislation of the Republic of Kazakhstan, internal documents of the Fund, Code of Business Ethics, anti-corruption compliance requirements, policies, procedures, and internal controls;

violations in the areas of accounting, financial reporting, budgeting, tax accounting, procurement, contract work, asset management, and cash usage, including financial statement manipulation, concealment of material information, incorrect classification, or untimely recording of transactions;

falsification, forgery, destruction, concealment, improper storage or distortion of documents, accounting data, reports, registers, information and results of activities, including formal inventory taking;

unlawful use, access, copying, transfer, loss or disclosure of property, resources, intellectual property, personal data, trade secrets, confidential, proprietary, insider and other restricted information;

violations of labor legislation, labor rights, and ethical standards, including coercion to unlawful actions, illegal overtime work, forced resignation, discrimination, harassment, threats, psychological pressure, mobbing, bullying, and harassment;

any other actions or omissions that may cause damage to the Fund, its employees, partners, the state, society, or the Fund's business reputation.

43. The question of whether a report falls within the scope of this Policy shall be decided by the Fund's Anti-Corruption Compliance Officer and/or an individual responsible for receiving and reviewing reports, taking into account the report content,

nature of the alleged violation, and the Fund's internal documents.

3.3. Application Restrictions

44. This Policy is not intended to cover:

personal conflicts not related to possible violations of legislation, internal documents, or ethical standards of the Fund;

appeals whose subject matter is exclusively individual labor disputes, if they do not contain signs of a violation provided for by this Policy;

complaints about working conditions, remuneration, work schedule, or organizational decisions, provided such complaints are not related to corruption, discrimination, pressure, violation of labor rights, or other unlawful actions;

complaints aimed solely at expressing personal dissatisfaction, insulting, discrediting, or harming another person;

knowingly false reports and reports aimed at abusing the right.

45. If the message does not fall within the scope of this Policy, the Fund may forward it for consideration to the structural unit or body of the Fund whose competence includes the issue raised, including the HR office or the corporate security service. The applicant is notified of the report transmission when possible and provided confidentiality is maintained.

46. In the event of an immediate threat to life, health, safety of people, property, or information systems, or if there are signs of a crime, the applicant is advised to immediately contact emergency services, law enforcement agencies, or other authorized state bodies. Direction of the report through the Fund's internal channels does not limit the individual's right to such an appeal.

4. PROCEDURE FOR INFORMING ABOUT AND REVIEWING VIOLATION REPORTS

4.1. Message direction

47. A person possessing information about a suspected violation has the right to send a notification through any available internal whistleblowing channel, as defined by this Policy and published on the Fund's official website.

48. Report may be submitted in writing or orally through channels approved by the Fund, including a dedicated phone number, email, an online form, or in person to the Anti-Corruption Compliance Officer or the General Director. When receiving an oral message, its content is recorded in writing by the person receiving the message.

49. An individual has the right to send a message anonymously. An anonymous message is considered if it contains information sufficient for preliminary assessment, verification, or a request for additional information through an available feedback channel.

50. Applicant is not obliged to conduct an independent check or investigation. When sending a report, the applicant must in good faith state the facts and circumstances known to them that served as the basis for the report, and attach available materials if any.

Evidence obtained in violation of the legislation of the Republic of Kazakhstan, interference in the activities of other employees, or creation of a threat to the life, health, safety, or legitimate interests of the applicant and other individuals is not permitted.

51. If possible, it is recommended to include a description of the alleged violation (circumstances, date, period, and place of commission), information about the involved individuals, departments, or counterparties, information about possible risks, damages, and consequences, as well as attach available documents (electronic files, correspondence, photographs, links, witness information) and other materials. The applicant can specify a preferred contact method to receive feedback.

Absence of specific information or materials is not grounds for refusing to accept a message if its content allows for a preliminary assessment.

52. Individual is advised to send a notification immediately after receiving information about the alleged violation.

Timely notification allows the Fund to take measures to prevent or minimize damage, preserve materials, and conduct an investigation.

4.2. Registration and preliminary assessment of messages

53. All messages received through confidential reporting channels shall be registered in a confidential register maintained by the Fund's Anti-Corruption Compliance Officer or another authorized individual of the Fund.

54. Access to the register, audit materials, and information about applicants is granted only to authorized persons to the extent necessary for reviewing the report, conducting the audit, making decisions, and monitoring implementation of response measures.

55. Within 2 business days from the date of registration, authorized individual conducts a preliminary assessment of the report and determines:

whether message falls within the Policy scope;

whether an inspection is required;

whether urgent measures are necessary to prevent damage, preserve evidence, prevent retaliation, or resolve a conflict of interest;

whether the review participants have any conflicts of interest;

whether the report needs to be transferred for consideration to another authorized body of the Fund or a state body.

56. An individual with a conflict of interest in connection with the report review is obliged to recuse themselves immediately. The Fund ensures the report transfer to an independent authorized individual, Committee, or external expert.

57. Communications concerning persons authorized to receive, register, consider, or verify communications shall be forwarded for consideration to a person or management body of the Fund that does not have a conflict of interest:

regarding the Director General – to the Chairman of the Fund's Management Committee;

regarding a member of the Executive Committee – to the Chairman of the Executive Committee without the participation of the relevant member;

regarding the head of internal audit service, anti-corruption compliance officer, advisor to the General Director, or other authorized individuals—to the higher governing body of the Fund for organization of an independent review by appointing an auditor, forming a Committee, or engaging an external expert.

58. Individuals in respect of whom a report has been received, as well as individuals whose personal interest may affect objectivity and impartiality of the report consideration, are not allowed to consider it, conduct an investigation, and make decisions based on its results, and are not entitled to influence these processes.

4.3. Report verification

59. If there are grounds, the Fund conducts an internal investigation of the report. Inspection is carried out by competent and independent individuals in compliance with the principles of legality, objectivity, confidentiality, proportionality, presumption of innocence, and respect for the rights of all involved parties.

60. For the purpose of conducting an audit, authorized persons shall have the right, within the framework of the legislation of the Republic of Kazakhstan and internal documents of the Fund, to request documents and explanations, conduct interviews, as well as examine contracts, accounting and financial documents, business correspondence, information system data, and other materials related to the report.

61. Employees of the Fund and other individuals to whom this Policy applies are obliged, within the scope of their authority and contractual obligations, to facilitate the audit: to promptly provide accurate information and documents, to ensure the preservation of materials related to the audit, and to prevent their destruction, concealment, alteration, or falsification.

Specified actions are a violation of this Policy and entail response measures in accordance with the legislation of the Republic of Kazakhstan and internal documents of the Fund.

62. An individual subject to the inspection shall be notified thereof to an extent and within a timeframe that does not create a risk of loss of evidence, pressure on the applicant or witnesses, interference with the inspection, or divulgence of confidential information. The applicant's identity is not disclosed without their written consent, except in cases expressly provided for by the legislation of the Republic of Kazakhstan.

63. An individual being investigated has the right to provide written and oral explanations, documents, and other materials, as well as to access information pertaining to them to an extent that does not impede the investigation and does not violate confidentiality, rights of the applicant, witnesses, and other persons. Such an individual has the right to appeal the actions and decisions of the Fund in the manner established by the legislation of the Republic of Kazakhstan and internal documents of the Fund.

64. An internal audit shall be appointed by order of General Director or by decision of another body of the Fund authorized to do so in accordance with the Charter of the Fund and this Policy, and shall be conducted within 15 calendar days from the date of adoption of the relevant decision.

If it is necessary to obtain information from third parties, study a significant volume of materials, conduct an examination, or if there are other objective reasons, inspection period may be extended by a motivated decision of an individual or body of the Fund who appointed the inspection. However, total inspection period must not exceed two months from the date of the decision to conduct it.

65. The applicant is informed about the extension of deadline and its reasons within 3 business days from the relevant decision date, if feedback is possible. Information is provided in compliance with the confidentiality requirements and legislation of the Republic of Kazakhstan.

66. The applicant is informed of the report registration, progress of its review, and the final status, if possible. Information is provided to the extent that it does not

violate confidentiality requirements, personal data legislation, third-party rights, commercial secrets, or other legally protected secrets.

5. RESPONSIBILITY AND RESPONSE MEASURES

67. Members of the Executive Committee, advisors to the Director General, heads of structural divisions, and other employees of the Fund, within the scope of their powers and official duties, ensure compliance with the legislation of the Republic of Kazakhstan, internal regulatory documents of the Fund, requirements of business ethics, anti-corruption compliance, internal control, and risk management.

68. An internal audit is conducted to establish circumstances of the report and to take measures within the Fund's competence. It does not replace pre-trial investigation, court proceedings, and other procedures carried out by authorized state bodies. Issues of legal liability of individuals are resolved in the manner established by the legislation of the Republic of Kazakhstan.

69. Based on the internal audit results, the Fund shall take proportionate response measures, taking into account the nature and consequences of violation, degree of fault, presence of damage, recurrence of the violation, circumstances of the case, and requirements of the legislation of the Republic of Kazakhstan.

70. Response measures may include:

submission of materials to authorized state bodies if there are grounds provided for by law;

application of disciplinary measures, including termination of employment relations, provided there are legal grounds and compliance with the procedure established by the labor legislation of the Republic of Kazakhstan;

taking measures to compensate for damages, protect the property interests of the Fund, recover debts, and revise or terminate contractual relations with counterparties;

restricting access to information systems, assets, documents, or individual operations within the Fund's competence;

elimination of the violation consequences, restoration of documents and credentials, conducting inventory and other control procedures;

improvement of processes, internal controls, risk management measures, as well as implementation of corrective and preventive actions;

conducting training, briefings, and monitoring implementation of adopted decisions.

6. FINAL PROVISIONS

71. This Policy is part of the Fund's corporate governance, internal control, risk management, corporate ethics, and anti-corruption compliance system.

72. In case of conflict between this Policy and the legislation of the Republic of Kazakhstan, the legislation of the Republic of Kazakhstan shall apply. Invalidity, modification, or inapplicability of any provision of the Policy shall not affect the validity of its remaining provisions.

73. The Fund ensures that employees are familiar with the Policy by publishing it on the internal information resource, conducting training, briefings, and other

accessible methods.

Current version of the Policy is posted on the Fund's official online resource to the extent determined by the Fund.

74. Anti-corruption compliance service organizes explanation of the Policy's provisions, advises on reporting procedures, and coordinates information and awareness activities together with the responsible persons of the Fund.

75. Policy is reviewed at least once every three years, as well as when the legislation of the Republic of Kazakhstan, the Fund's structure, information channels, internal processes, risk management system change, or when the need for its update is identified.

76. This Regulation is approved by the executive collegial body of the Fund and remain in effect until that body decides to terminate them. Amendments and additions to this Regulation is approved by the executive collegial body of the Fund in accordance with the Fund Charter, internal documents of the Fund, and distribution of powers.

7. TERMS AND DEFINITIONS

77. For the purposes of this Policy, the following basic terms and definitions are used:

anonymous report — a report of a violation submitted without information that would allow the applicant identification;

internal audit — a set of actions carried out by the Fund to establish the circumstances set out in the report, assess reliability of the information provided, and take measures within the competence of the Fund;

good faith report — a report made by an individual who had reasonable grounds to believe that the information provided was true, regardless of whether it was confirmed by the results of the verification;

applicant — an individual or legal entity that has sent a notification of a violation through the Fund's internal channels or to an authorized state body;

confidential information regarding the report — information about the applicant's identity, content of the report, individuals being investigated, and materials and results of the investigation, access to which is restricted in accordance with the legislation of the Republic of Kazakhstan and this Policy;

conflict of interest — a contradiction between the personal interests of an employee, official, or other person and their official powers, where personal interest may affect or create the appearance of the possibility of influencing the objective and impartial performance of duties and decision-making in the interests of the Fund;

corruption — illegal use of official or service powers and related opportunities to obtain material or non-material benefits and advantages for oneself or third parties, as well as bribery through the provision of such benefits and advantages;

corruption offense — an unlawful, culpable act or omission containing signs of corruption, for which administrative or criminal liability is established by the legislation of the Republic of Kazakhstan;

response measures — decisions and actions of the Fund based on the report review, aimed at eliminating the violation and its consequences, compensating for damages, holding responsible persons accountable within the Fund's competence, as

well as preventing recurrence of violations;

retaliation — any direct or indirect act or omission that creates adverse consequences for the applicant in connection with sending a report, participating in an investigation, or assisting in establishing circumstances of a violation;

breach notification — information about the fact, signs, or reasonable suspicion of a breach, preparation for a breach, or possible commission of a breach, sent through proactive reporting channels;

authorized individual — an employee, structural unit, collegial body, or engaged external expert who is entrusted with receiving, registering, reviewing, verifying reports, or making decisions based on their results in accordance with this Policy;

individual subjected in the report — an individual whose actions or omissions are indicated in the report as a possible violation;

Proactive notification — voluntary disclosure by the applicant of information about a violation, submitted through the Fund's internal channels.