Appendix
to the resolution of the Board of Directors
of the Qazaq Green Power PLC
dated 17 June 2026
(Minutes № 11)

Proactive Disclosure Policy of the Qazaq Green Power PLC Group

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Contents

1. Purpose and general provisions

1. The Qazaq Green Power PLC and its subsidiaries (hereinafter referred to as «the Company» or «we») are committed to the highest standards of corporate governance, transparency and accountability. We always conduct our business in accordance with our values, principles and standards of conduct as set out in the Code of Conduct of Qazaq Green Power PLC and its subsidiaries (hereinafter referred to as the «Code of Conduct»), and we adhere to a policy of zero tolerance towards corruption in any form or manifestation in the course of our business activities.

2. We have implemented and adopted this Whistleblowing Policy of the Qazaq Green Power PLC group (hereinafter referred to as the «Policy») to manage risks relating to breaches of principles and standards of conduct, and to comply with the requirements of anti-corruption legislation and the Organisation for Economic Co-operation and Development's Guidelines on Combating Bribery.

3. This Policy has been drawn up in accordance with anti-corruption legislation and other statutory provisions, the Code of Conduct, the Anti-Corruption Policy of the Qazaq Green Power PLC, internal regulatory documents governing the Company's activities, and best practices in the field of business ethics and compliance, including relevant international standards.

4. This Policy applies to officers and employees of subsidiary organisations (hereinafter referred to as «SO's»), 100 per cent of whose voting shares (equity interests) are owned by the Company or held in trust by the Company, as well as to other interested parties. The application of this Policy to SO's in which the Company holds less than 100 per cent of the voting shares (equity interests) shall be agreed and approved by the authorised bodies of those SO's.

5. Any breach, in particular failure to comply with the requirements of legislation and internal regulations, may cause significant damage to our Company's and/or the Subsidiary's operations and reputation. We therefore require officers and employees, and encourage other stakeholders, to raise concerns regarding non-compliance with legislation and the Company's and/or the Subsidiary's internal regulations.

6. This Policy is mandatory reading and must be published on the Subsidiaries' corporate websites.

2. Terms and abbreviations

Term/abbreviation	Definition
Anti-corruption legislation	The legislation of the Republic of Kazakhstan and/or the regulations of the Astana International Financial Centre and/or the applicable

	international standards governing anti-corruption matters
Internal investigation	A set of audit activities carried out on the grounds and in accordance with the procedure established by the Corporate Standard for the Compliance Function of the Samruk-Kazyna JSC Group, conducted by the Company's compliance function and/or its subsidiaries on instruction, either independently or with the involvement of relevant departments. The purpose of the investigation is to identify and verify the facts of possible breaches of legislation and internal regulations, to analyse and assess the circumstances that contributed to the breach, and to take a reasoned decision based on its findings.
Group of Companies	The Qazaq Green Power PLC and its subsidiaries
Officials	Members of the governing bodies, the sole or collective executive body of the educational organisation, as well as persons who, on a permanent, temporary or special mandate basis, perform organisational, managerial, administrative or financial functions
Subsidiary and/or SO	A legal entity in which the Company holds 100 per cent of the voting shares (equity interests), either as owner or under the Company's trust management
Interested parties	Natural and/or legal persons, as well as associations thereof, which influence or may be influenced by the Group's activities, its products, services and/or solutions, or which are reasonably deemed to be subject to the influence of the Group's activities, by virtue of applicable legislation, concluded transactions or other circumstances
Proactive information channel (hotline)	Communication channels managed by the operator and intended for receiving enquiries and messages regarding the Group's activities, including the «Hotline» website, telephone,

	email and WhatsApp, the contact details for which are published on the Group's official websites
Compliance function	The organisational unit or individual responsible for carrying out the compliance function, or individuals engaged to provide relevant services within the Group, whose primary task is to establish an effective compliance system, monitor compliance risk management and perform other functions as provided for in the internal documents of Samruk-Kazyna JSC , Samruk-Energo JSC insofar as they apply to the Group of Companies, as well as those adopted for implementation by the Group of Companies in accordance with the established procedure

7. Terms used but not defined in this Policy shall have the meanings given to them in the relevant legislation and the Group's internal regulations.

3. Key Principles

8. **Commitment to Proactive Reporting and Zero Tolerance for Violations**

The Group of Companies recognizes proactive reporting as one of the key elements of its anti-corruption framework and is committed to a zero-tolerance approach to violations of applicable laws and internal regulations. All reports of potential violations shall be reviewed regardless of the status or position of the individuals concerned.

9. **Leadership Commitment and Tone from the Top**

he officers and managers of the Group of Companies demonstrate their commitment to the Speak Up culture, foster an environment of openness and trust, and ensure that employees and other stakeholders can raise concerns freely and in good faith without fear of retaliation.

10. **Good Faith and Responsibility in Speak Up Reporting**

Reports should be made in good faith, based on a reasonable belief that a violation may have occurred, and without malicious intent. The Group of Companies presumes that any individual raising a concern is acting in good faith and does not require them to conduct their own investigation or gather evidence.

11. **Protection Guarantees and Non-Retaliation**

The Group of Companies provides protection to individuals who, in good faith, report violations against any form of retaliation, discrimination, or adverse consequences. These protection guarantees also apply to individuals who assist with reviews or investigations. Retaliation against individuals who raise concerns shall be considered a serious violation of the Company's and its subsidiaries' internal regulations.

12. **Confidentiality, Anonymity and Independence of Reporting Channels**

The Group of Companies ensures the confidentiality of information regarding the identity of individuals who submit reports and provides the possibility to submit reports anonymously.

To enhance trust in and ensure the independence of the reporting system, the Group of Companies uses independent external Speak Up channels.

The coordination, registration and processing of submitted reports are carried out by the Compliance Service of JSC Samruk-Energy and the Company's compliance function with respect to its subsidiaries in accordance with the procedures established by internal regulations.

13. **Objectivity, Proportionality and Effectiveness of Response**

All reports submitted through Speak Up channels are reviewed objectively, impartially and within reasonable timeframes. Response measures shall be proportionate to the nature of the identified violations and shall be aimed not only at holding responsible individuals accountable, but also at eliminating the root causes and conditions contributing to violations, as well as improving the risk management system.

4. Scope of Application

14. This Policy establishes the procedures to be followed by officers, employees of the Group of Companies, and other stakeholders when reporting actual, ongoing or potential violations related to the activities of the Group of Companies.

15. This Policy does not apply to the review of requests submitted by individuals and legal entities in accordance with the Administrative Procedural and Process-Related Code of the Republic of Kazakhstan.

16. The types of violations subject to review under this Policy are set out in the Appendix to this Policy.

5. Raising Concerns

17. The Company fosters an open environment in which officers, employees and stakeholders can report potential violations of applicable laws and internal regulations of the Group of Companies through any available reporting channels without fear of retaliation.

18. Any officer, employee or other stakeholder who has reasonable grounds to believe that violations exist within the areas covered by this Policy may report such violations within a reasonably short timeframe. Reports shall be submitted in good

faith, without knowingly providing false information or malicious intent. Officers, employees and other stakeholders are not required to conduct any reviews or investigations into the facts relating to potential violations.

19. Officers, employees and other stakeholders may, at their discretion, report potential violations, including on a confidential and/or anonymous basis.

20. The Group of Companies operates a Speak Up channel (hotline) for receiving reports of potential cases of corruption, fraud, discrimination, unethical conduct, violations of the Code of Conduct requirements, as well as other violations directly or indirectly related to anti-corruption matters.

21. The Group of Companies recognizes the importance of strengthening trust in the Speak Up channel (hotline) to ensure that officers, employees of the Group of Companies and other stakeholders are confident that their reports will be properly reviewed and that appropriate response measures will be taken. In this regard, the hotline is administered by an external operator, enabling officers, employees of the Group of Companies and other stakeholders to raise concerns with an independent third party.

22. The hotline comprises a system of Speak Up channels administered by an external operator, designed to receive reports of violations, provide feedback to report submitters, and ensure anonymity, confidentiality and 24/7 availability.

23. To increase awareness of the Speak Up channel (hotline) among officers, employees and stakeholders, information campaigns are conducted through corporate email communications, posters and notices are displayed in the offices of the Group of Companies, and information with up-to-date hotline contact details is published on corporate websites.

24. In addition to the Speak Up channels, individuals may also raise concerns through the following channels:

a) Immediate supervisor – through a personal meeting or in writing. When submitting a written report, it is recommended to provide the background and chronology of the matter giving rise to the concern and to specify the reasons for such concern.

b) Higher-level manager – if the matter concerns the immediate supervisor or if an employee prefers not to discuss the matter with them. It is recommended that the matter and the reasons for the concern be clearly described in writing.

c) Ombudsman – if the matter relates to labour disputes, conflicts, social and labour issues, discrimination, harassment or bullying. The concern may be raised either verbally or in writing.

d) Security function/department – regarding threats to economic, information or internal security, information leaks, disclosure of confidential, commercial or insider information, as well as violations of applicable laws.

e) The Company’s and subsidiaries’ compliance functions – regarding potential violations of laws, the Code of Conduct and internal regulations. Such reports may also be submitted where other reporting channels are ineffective in addressing the matter or where an employee or other stakeholder prefers not to discuss the matter with their immediate supervisor.

25. The responsibilities of report recipients include:

a) ensuring the receipt of reports of potential violations and their registration in accordance with the established procedure;

b) ensuring the transfer of reports to the Company's and/or subsidiaries' compliance functions in cases provided for by the Company's/subsidiaries' internal regulations;

c) contributing to the development of an open environment that encourages good-faith reporting of potential violations;

d) performing other responsibilities stipulated by the Company's/subsidiaries' internal regulations.

26. No provisions of the Company's and/or subsidiaries' internal regulations may restrict the right of officers, employees and other stakeholders to report potential violations of applicable laws directly to authorized state authorities.

6. Protection Against Retaliation

27. The Company strictly prohibits any form of retaliation, discrimination or other adverse consequences against individuals who, in good faith, report potential violations in accordance with this Policy.

28. Retaliation means any actions (or omissions) resulting in direct or indirect adverse treatment of an individual, including, but not limited to, dismissal, demotion, deterioration of working conditions, reduction of salary, deprivation of bonuses and/or incentives, threats, intimidation, social exclusion, unjustified criticism of work performance, and other similar actions.

29. Protection against retaliation applies to officers, employees and other stakeholders of the Group of Companies, as well as to individuals who conduct reviews (investigations) or provide assistance in connection with such reviews (investigations).

30. To prevent retaliation, officers and employees of the Group of Companies involved in the review of reports shall ensure the confidentiality of the reporter's identity and restrict access to information regarding the review (investigation) to authorized individuals only.

31. If any instances of retaliation occur, the reporter has the right to immediately notify the Company's and/or subsidiaries' compliance functions or use the Speak Up channels. The Company's and/or subsidiaries' compliance functions shall review such reports, take measures to prevent and stop retaliation, and initiate an internal investigation within the timeframes established by the Company's and/or subsidiaries' internal regulations.

32. If retaliation is confirmed, individuals responsible for such actions shall be subject to liability measures in accordance with applicable laws and the Company's and/or subsidiaries' internal regulations.

33. The Company and/or its subsidiaries also ensure protection against knowingly false reports. Officers and employees acting in bad faith, providing knowingly false information, or taking actions for the purpose of obtaining personal benefit and/or with malicious intent may be subject to liability measures in accordance with applicable laws and the Company's and/or subsidiaries' internal regulations.

7. Response Measures

34. Reports submitted through Speak Up channels are registered by the external operator and forwarded to JSC «Samruk-Energy» and the Company through the hotline information system. Responses to reporters are provided through the relevant hotline communication channels.

35. All submitted reports shall be subject to a comprehensive review, regardless of whether the reporter is anonymous or identifiable. The Company/subsidiaries may, however, decide not to review anonymous reports if they do not contain specific facts, substantiated information or evidence of violations sufficient to conduct an objective review, or if they are intended to discredit specific individuals without specific facts or substantiated information and contain threats.

36. Since the coordinators of the Speak Up channel are the Compliance Service of JSC «Samruk-Energy» and the Company's compliance function, the persons specified in subparagraphs a)–d) of paragraph 24 of this Policy shall notify the Compliance Service of JSC «Samruk-Energy» and the Company's and/or subsidiaries' compliance functions of any received reports within 1 (one) business day from the date of receipt to ensure centralized registration and coordination.

37. The procedure for reviewing reports is governed by the Company's/subsidiaries' internal regulations.

38. Reports relating to the procurement of goods, works and services, challenges to the actions and decisions of customers, suppliers, intermediaries, organizers, tender commissions, expert commissions, or operators of the electronic procurement information system of the companies within the JSC «Samruk-Kazyna» group shall not be registered in the hotline information system. The reporter shall be informed of this when submitting such a report. The external operator shall provide feedback to the reporter regarding the need to submit such matters through the procurement web portal zakup.sk.kz in accordance with applicable laws and the Procurement Procedure of the National Welfare Fund «Samruk-Kazyna» JSC and legal entities in which fifty percent or more of the voting shares (participation interests) are directly or indirectly owned or held in trust by «Samruk-Kazyna» JSC.

39. Reports containing information indicating signs of offences committed by the Company/subsidiaries shall not be reviewed. The individual who raised a substantiated concern shall be informed of the need to contact the authorized state authorities. If it is not possible to notify such individual of the need to contact the authorized state authorities, the relevant information shall be forwarded to the Compliance Service of JSC «Samruk-Energy», the Company's compliance function, and the Company's/subsidiaries' security function for further review and referral to the authorized state authorities of the Republic of Kazakhstan.

40. The Company's/subsidiaries' compliance functions shall periodically submit reports to the governing body of the Company and/or subsidiaries on the results of reviewing reports and conducting internal investigations.

8. References to Regulatory Documents

№	Document title
1	AIFC Anti-Money Laundering, Counter-Terrorist Financing, and Sanctions Rules (AML/CTF/FS)
2	The Law of the Republic of Kazakhstan On Combating Corruption
3	The Articles of Association of the Qazaq Green Power PLC
4	The Corporate Standard for the Compliance Function of the «Samruk-Kazyna» JSC Group

Appendix
to the Proactive Disclosure Policy of the Qazaq Green Power PLC Group

Types of breaches that may be considered under the Policy

Category	Subcategory
Corruption-Related Violations	Exceeding one's authority and abuse of office
	Accepting unlawful remuneration and gifts
	Lobbying on behalf of certain interests and granting unjustified preferential treatment
Theft, Fraud and Data Misrepresentation	Misappropriation, embezzlement, theft and misuse of assets
	Fraud and financial malpractice
	Deliberate misrepresentation of data in financial, accounting or any other reports
	Falsification of records and documents; forgery of documents
	Inclusion of false information in documents governing internal processes
Ethical Violations and Labour Disputes	Discrimination and harassment
	Failure to comply with corporate culture and standards of conduct
	Breaches of employment rights and unequal terms and conditions of employment
	Breaches of anti-corruption regulations, including conflicts of interest (without evidence of corruption)
Occupational Health and Safety and Environmental Issues	Breach of health and safety standards
	Breach of environmental standards and requirements
Non-Compliance with Legal and Internal Requirements	Breach of applicable legislation and internal requirements
	Breach of procurement procedures
	Disclosure of confidential information
	Unlawful use of inside information
Other Violations	Other breaches of applicable legislation and internal requirements