

APPROVED

Director of LLP "Viva Marketing & Distribution"
Imanalin A.B.

ANTI-CORRUPTION POLICY

LLP "Viva Marketing & Distribution"
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1. KEY DEFINITIONS AND TERMS

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

Anti-Corruption Clause – contractual provisions between the Partnership and counterparties defining measures to counter corruption by both parties in fulfilling their contractual obligations.

Anti-Corruption Restrictions – restrictions established by the Law of the Republic of Kazakhstan on Corruption in relation to persons authorized to perform state functions, persons equivalent to them (excluding candidates for President of the Republic of Kazakhstan, deputies of the Parliament of the Republic of Kazakhstan or maslikhats, akims of district-level cities, towns, villages, rural districts, as well as members of elected local government bodies), officials, and candidates authorized to perform such functions, to prevent them from engaging in actions that may result in the misuse of their powers for personal, group, or other non-official interests.

Charitable Contributions – payments made without request or expectation of commercial benefits to registered charitable organizations and other public associations exclusively for societal benefits, such as charity, education support, social assistance, or similar objectives.

Government Bodies – state institutions authorized by the Constitution, laws, and other regulatory legal acts to perform state functions, issue acts defining mandatory rules of conduct, manage and regulate socially significant public relations, and monitor compliance with established state-mandated rules of conduct.

Government Official – a citizen of the Republic of Kazakhstan holding a paid public position in a government body as established by the legislation of the Republic of Kazakhstan and performing official duties to implement state tasks and functions.

Civil Servant – an individual holding a paid permanent position in public enterprises or government institutions as established by the legislation of the Republic of Kazakhstan and performing official duties to achieve their objectives and functions, including technical support and operation of government bodies.

Bribery – the act of offering a bribe, directly or through an intermediary, to a person authorized to perform state functions, an equivalent person, a person holding a responsible position, or an official of a foreign state or international organization in the form of money, securities, other property, property rights, or material benefits in return for actions (or inactions) in favor of the bribe-giver or the represented persons, if such actions (or inactions) fall within the official's authority or influence.

Official – a person who permanently, temporarily, or under special authority performs representative functions of power or administrative, managerial, or economic functions in government bodies, quasi-public sector entities, local self-government bodies, as well as in the Armed Forces of the Republic of Kazakhstan, other troops, and military formations of the Republic of Kazakhstan.

Abuse of Authority – misuse of authority by a person performing managerial functions in the Partnership or another organization against the legitimate interests of the Partnership or another organization to gain personal or third-party benefits or cause harm to others, resulting in significant harm to the rights and legitimate interests of citizens, organizations, or legally protected interests of society or the state.

Commercial Bribery – the unlawful transfer of money, securities, or other assets to a person performing managerial functions in the Partnership or another organization, or providing illicit property-related services in exchange for the misuse of their official position or general patronage.

Counterparty – any natural or legal person entering into negotiations or contractual relations with the Partnership, including agents, consultants, and other third parties.

Corruption – unlawful use of official powers and associated opportunities by persons holding responsible state positions, persons authorized to perform state functions, persons equivalent to them, and officials for personal or third-party benefits, including bribery through the provision of benefits and advantages.

Corrupt Actions – as per this Policy, corrupt actions include abuse of authority, offering a bribe, receiving a bribe, intermediating bribery, commercial bribery, or other illegal use of official position or authority in violation of public or state interests for financial gain, including money, valuables, other assets, or property-related services for personal or third-party benefit. Corrupt actions also include the above-mentioned acts committed on behalf of or in the interest of the Partnership.

Corruption Offense – an unlawful, culpable act (action or inaction) with signs of corruption for which administrative or criminal liability is established by law.

Person Holding a Responsible Government Position – a person holding a position established by the Constitution of the Republic of Kazakhstan, constitutional and other laws of the Republic of Kazakhstan for the direct implementation of state functions and authority, including a Member of Parliament, a judge, or a person holding a political or administrative government position under the law on public service of the Republic of Kazakhstan.

Person Equivalent to Those Authorized to Perform State Functions – a person elected to local government bodies; a citizen registered as a candidate for President of the Republic of Kazakhstan, a Member of Parliament, or a maslikhat; an akim of a district-level city, town, village, or rural district; a member of an elected local government body; an employee permanently or temporarily working in a local government body whose salary is paid from the state budget; a person performing managerial functions in a state organization or quasi-public sector entity; or employees of the National Bank of the Republic of Kazakhstan and its subsidiaries.

Person Authorized to Perform State Functions – a government official under the laws of the Republic of Kazakhstan on public service, a maslikhat deputy, or a person temporarily performing official duties before being appointed to public service.

Receipt of Bribe – receiving a bribe directly or through an intermediary in the form of money, securities, other property, property rights, or material benefits in return for actions (or inactions) favoring the bribe-giver.

Illegal Material Compensation – receiving illegal material compensation, gifts, privileges, or services by a person authorized to perform state functions or an equivalent person in return for actions (or inactions) in favor of those providing the benefits.

Bribery of Government or Civil Servants – offering or promising any financial or other benefits to government or civil servants to influence their official duties in favor of the Partnership.

Intermediation in Bribery – direct transfer of a bribe on behalf of the bribe-giver or the recipient, or facilitating their agreement to exchange a bribe.

Counteracting Corrupt Actions – activities by the Partnership and its employees to prevent, identify, suppress, and eliminate corruption and its consequences.

Illegal Material Incentives – illegal provision of material incentives, gifts, privileges, or services to persons authorized to perform state functions or equivalent persons.

Partnership Employee – any individual engaged in labor relations with the Partnership.

Sponsorship Assistance – property provided free of charge for publicity purposes by the Partnership.

Structural Unit – departments, divisions, and offices forming the Partnership's organizational structure.

Quasi-Public Sector Entities – state enterprises, LLPs, and JSCs affiliated with the state.

2. GENERAL PROVISIONS

2.1. The Anti-Corruption Policy of LLP "Viva Marketing & Distribution" (hereinafter referred to as the "Policy") has been developed in accordance with the legislation of the Republic of Kazakhstan (hereinafter referred to as "RK"), including but not limited to: the RK Law "On Counteracting Corruption" (hereinafter referred to as the "RK Anti-Corruption Law"), the RK Code of Administrative Offenses, the RK Criminal Code, as well as the Code of Corporate Ethics and internal regulatory documents of LLP "Viva Marketing & Distribution" (hereinafter referred to as the "Partnership").

Considering that the Partnership cooperates with foreign counterparties, it makes every effort to comply with the requirements of the UK Bribery Act, the US Foreign Corrupt Practices Act, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, to the extent applicable to the Partnership and such relationships.

2.2. This Policy defines the key objectives and tasks of the anti-corruption system within the Partnership, the principles and organization of corruption prevention measures, the participants in the process, their roles, functions, powers, and responsibilities, including in relationships with counterparties, government officials, and civil servants.

2.3. The Partnership adheres to the principle of zero tolerance for any form of corrupt activity. This Policy establishes the managerial and organizational framework for preventing corruption and minimizing the consequences of potential corrupt actions.

2.4. This Policy sets out minimum requirements and standards and serves as a key component of the Partnership's anti-corruption program, along with other related documents and procedures designed to assist the Partnership's Director in effectively managing key areas of corruption risk in both the private and public sectors.

2.5. The Policy is mandatory for all employees of the Partnership to familiarize themselves with and comply with.

2.6. The Partnership expects employees to adhere to the ethical principles, approaches, and requirements established by this Policy, taking into account the allowances and restrictions set forth herein.

2.7. The general principles and prohibitions of this Policy also extend to third parties acting on behalf of the Partnership.

2.8. The Partnership and its employees are not permitted to circumvent the requirements of this Policy through the actions of third parties.

2.9. This Policy serves as the foundation for the development of the Partnership's internal regulatory documents in the field of anti-corruption compliance.

3. OBJECTIVES AND TASKS OF ANTI-CORRUPTION PROCEDURES

3.1. The objectives of anti-corruption procedures include:

- Ensuring the Partnership's activities comply with the applicable anti-corruption legislation of RK;

- Ensuring the Partnership's compliance with the applicable provisions of the UK Bribery Act, the US Foreign Corrupt Practices Act, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions in the context of cooperation with foreign partners.

3.2. Anti-corruption efforts involve the activities of the Director, heads of structural divisions, and all employees of the Partnership within their competencies in:

- Preventing corruption, including identifying and eliminating the causes of corrupt practices;
- Combating corruption by detecting, preventing, suppressing, exposing, and investigating corrupt actions;
- Minimizing anti-corruption risks.

3.3. The main tasks of anti-corruption procedures include:

- Creating effective mechanisms, controls, and other measures aimed at counteracting corruption;
- Developing intolerance to corrupt behavior among employees and counterparties of the Partnership;
- Establishing a unified understanding of this Policy's principles among the founders, employees, and counterparties of the Partnership;
- Taking measures to minimize the risk of the Partnership and its employees being involved in corrupt activities;
- Informing the Partnership's Director about corruption incidents and the measures taken to counteract them;
- Communicating and clarifying key anti-corruption legislative requirements of RK and global anti-corruption practices applicable to the Partnership and its employees.

3.4. In combating corruption, the Partnership adheres to the following principles:

- Legality;
- Rejection of corruption in any form or manifestation;
- Zero tolerance for corrupt practices by any employee of the Partnership or its counterparties;
- Prohibition of corrupt activities;
- Active employee engagement in anti-corruption efforts.

4. CORRUPT ACTIVITIES

4.1. For the purposes of this Policy, corrupt activities refer to actions committed:

- In relation to the Partnership or on its behalf, including interactions with government authorities, officials, or other persons authorized to perform governmental functions, as well as legal entities and their employees, governing bodies, and representatives of such legal entities;
- Directly or indirectly;
- Personally or through intermediaries;
- Regardless of purpose, including facilitating administrative or other procedures, obtaining competitive or other advantages, associated with corrupt activities;
- In any form, including but not limited to receiving/providing money, valuables, gifts, benefits, other property or property-related services, or other property rights.

4.2. The following actions are recognized as corrupt activities under this Policy:

- Bribery;
- Receiving bribes;
- Mediation in bribery;
- Commercial bribery;
- Abuse of authority;
- Bribing government and civil servants;
- Using an employee's position and/or official powers for personal or third-party financial or other benefits not provided by RK legislation;
- Any other illegal use of official position contrary to the legitimate interests of the Partnership for financial or other benefits.

4.3. The following actions are deemed unacceptable and incompatible with the activities of the Partnership:

- Offering or accepting any financial benefits by employees of the Partnership not provided for by RK legislation (including loans, fees, rewards, discounts, or other advantages);
- Payments to fictitious organizations or organizations with non-transparent ownership structures;
- Provision of services free of charge or at non-market prices, except for cooperation agreements and other agreements that do not involve actual payments;
- Illegal appropriation of material and intangible assets through fraud or abuse of trust.

4.4. Employees of the Partnership are prohibited from engaging in any actions specified in Section 4.3 of this Policy, including directly or indirectly, personally or through intermediaries, making payments to facilitate administrative, bureaucratic, or other formalities in any form, including money, valuables, services, or other benefits to or from any individuals or organizations, including commercial entities and their representatives, government authorities and local self-government bodies, officials, or other persons authorized to perform governmental functions, or equivalent persons under the RK Anti-Corruption Law, private companies, and their representatives.

4.5. If an employee of the Partnership becomes aware of a violation of this Policy or is offered conditions that would lead to a violation of this Policy, the employee must report such an incident in accordance with the provisions outlined in Article 13 of this Policy.

SCOPE AND RESPONSIBILITIES

5.1. Employees of the Partnership must be guided by this Policy and strictly comply with its provisions.

5.2. As part of managing the Partnership's corruption risks, the Director is responsible for:

- Ensuring compliance with anti-corruption legislation and overseeing adherence to this Policy, as well as the measures taken in this area.
- Approving the internal regulatory documents of the Partnership related to anti-corruption, except for those requiring approval by the General Meeting of Founders.
- Initiating internal investigations related to anti-corruption matters.
- Making decisions regarding the possibility of offering gifts on behalf of the Partnership.
- Deciding on the Partnership's participation in sponsorship or charitable activities.
- Approving representation expenses.

5.3. The Director, along with the Financial Director/Chief Accountant, is responsible for:

- Establishing and maintaining an ethical standard of zero tolerance for corruption at all levels.
- Overseeing compliance with this Policy, ensuring the effective resolution of anti-corruption issues by employees involved in implementing anti-corruption procedures.
- Making key decisions related to anti-corruption activities and initiatives.
- Reviewing relevant information on anti-corruption efforts as needed.
- Participating in the development of internal regulatory documents related to anti-corruption.
- Identifying areas, business activities, and processes with high corruption risks.
- Implementing anti-corruption procedures and measures.
- Conducting anti-corruption reviews of internal regulatory documents.
- Reporting to the Director on any actual or suspected corruption-related activities involving employees.
- Participating in internal investigations related to anti-corruption.
- Preparing training materials on anti-corruption compliance.
- Providing consultation to employees on anti-corruption matters.
- Ensuring employees are informed about and comply with this Policy.

5.4. The Director, Financial Director, and Chief Accountant, within their competencies, perform the following functions:

- Identifying potential threats to the economic interests of the Partnership and taking preventive measures.
- Organizing efforts to detect corruption-related behavior among employees.
- Coordinating with government authorities on internal investigations concerning intentional misconduct by employees.
- Organizing internal investigations.
- Conducting due diligence on business partners, including anti-corruption risk assessments of documentation.
- Initiating internal audits related to anti-corruption.
- Implementing preventive measures to identify corruption risks in the Partnership's business activities.
- Performing anti-corruption due diligence on contracts, agreements, and other official documents.
- Advising structural units and employees on compliance with Kazakhstan's anti-corruption legislation.
- Organizing and conducting training programs to ensure employees understand this Policy.
- Reporting any corruption-related violations to the Director.
- Leading by example in ethical and responsible behavior.
- Considering employees' adherence to anti-corruption policies as a factor in performance evaluations.
- Assessing, analyzing, and selecting business partners based on corruption risk factors.

5.5. All employees of the Partnership must:

- Strictly comply with Kazakhstan's anti-corruption laws, internal regulations, this Policy, and the Corporate Ethics Code.
- Familiarize themselves with this Policy and confirm their acknowledgment by signing an obligation statement as per Appendix 1.

- Adhere to national anti-corruption laws, foreign laws, and international regulations when acting on behalf of the Partnership in any country.
 - Fulfill their anti-corruption responsibilities within their scope of work.
 - Take reasonable steps to avoid business relationships with partners involved in corruption.
 - Collaborate with the Sales and Marketing Director, Financial Director/Chief Accountant, or their direct supervisor on anti-corruption issues.
 - Follow guidelines on giving and receiving gifts and representation expenses.
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KEY MEASURES AND DIRECTIONS

6.1. To effectively identify, assess, and mitigate corruption risks, the Partnership employs the following approaches:

- Identifying business activities and sectors with high corruption risks.
- Conducting legal reviews and due diligence on business partners to identify potential corruption risks.
- Performing anti-corruption due diligence on contracts and financial transactions, ensuring accurate documentation and record-keeping.
- Establishing adequate risk control mechanisms for managing corruption risks.
- Evaluating and processing all reports of corruption incidents or any attempts to involve employees in corrupt activities.
- Monitoring representation expenses.
- Overseeing charitable donations and sponsorships.
- Enforcing procedures for giving and receiving gifts.
- Ensuring employees acknowledge and comply with this Policy, including mandatory training and assessments on anti-corruption principles and best practices.

7. GIFTS AND REPRESENTATION EXPENSES

7.1. A gift is recognized as any tangible or intangible value for which there is no obligation to pay the usual price. This includes money, securities, and other assets, as well as benefits and property-related services (such as work, services, entertainment expenses, leisure, transportation costs, loans, discounts, the provision of property for use, including housing, charitable contributions, donations, and others) received or given in connection with employment in the Partnership.

7.2. The receipt of a gift by a Partnership employee may be perceived negatively by other employees or external parties (including founders, contractors, the state, and government authorities), even in the absence of bad faith or unreasonable intent on the part of the employee or the giver.

7.3. Gifts given to family members, relatives, or other close persons of a Partnership employee in connection with actions (or inaction) performed by the employee within their role in the Partnership are considered gifts to the employee for the purposes of this Policy.

7.4. Partnership employees are not allowed to accept gifts from any third parties:

- In exchange for any action (or inaction) related to their work in the Partnership;
- Exceeding a value of 2 Monthly Calculation Indexes (MCI);

- In the form of money or monetary equivalents;
- Without a commonly accepted reason for the gift.

7.5. The gift acceptance restrictions set forth in this Policy do not apply to gifts given by a Partnership employee's close family members (parents, children, spouses) or within personal relationships that exist independently of the Partnership. Additionally, gifts in the form of corporate souvenirs such as pens, notebooks, diaries, umbrellas, and similar items are exempt from these restrictions.

7.6. The restrictions on accepting gifts do not apply to charitable donations made by employees in their personal capacity to third parties (including other employees of the Partnership) or donations received by employees for charitable purposes (e.g., medical treatment fundraisers).

7.7. Any unauthorized gifts must be refused and returned to the giver. The employee must return any received gift to the giver in a manner that adheres to business ethics, except for those gifts permitted under clauses 7.5 and 7.6 of this Policy.

7.8. The Partnership's representation expenses, including business hospitality, may be incurred on behalf of and at the expense of the Partnership. Gifts and services may be provided or received on behalf of the Partnership or accepted from individuals and organizations with or seeking business relations with the Partnership only if they meet the following criteria:

- Representation expenses and gifts are directly related to legitimate business purposes, such as project presentations, contract completions, or generally accepted holidays;
- They align with standard business practices and do not exceed the norms of professional conduct (e.g., flowers, promotional or brand-related souvenirs);
- Their cost is moderate and proportionate to the nature of the event or the significance of the occasion, with the cost determination procedure following the Partnership's internal regulations;
- They do not constitute a covert reward for a service, action (or inaction), favor, patronage, granting of rights, or decision-making regarding transactions, agreements, licenses, permits, or similar matters, nor do they aim to influence the recipient unlawfully;
- They do not harm the business reputation of the Partnership;
- They comply with the principles and requirements of this Policy, the internal regulatory documents of the Partnership governing professional ethics, and the legislation of Kazakhstan;
- They are pre-approved by the Director.

7.9. The Partnership and its employees are prohibited from giving cash or cash-equivalent gifts to third parties, regardless of the currency type.

7.10. Other matters related to gifts and representation expenses are governed by the Partnership's internal regulatory documents.

7.11. If an employee has doubts regarding the acceptability of a gift or other related matters, they must seek clarification from their immediate supervisor.

8. FINANCING POLITICAL ACTIVITIES

8.1. The Partnership prohibits contributions (in cash or in-kind) for any political events or to finance political parties, organizations, or movements with the aim of gaining commercial advantages in specific Partnership projects.

8.2. Financial contributions may include both donations and loans, while in-kind contributions may include the provision of goods or services. "In-kind contributions" may encompass gifts, property loans, service provisions, advertising that promotes a political party, the purchase of tickets for fundraising events, as well as the practice of granting unpaid leave to Partnership employees for political campaigns or public office positions.

8.3. Partnership employees are prohibited from giving gifts, making political contributions, or organizing entertainment events for political parties or candidates for political positions on behalf of the Partnership.

9. CHARITABLE DONATIONS AND SPONSORSHIP

9.1. The procedure for providing charitable donations and sponsorship by the Partnership is determined by the Director and regulated by specific agreements concluded by the Partnership.

9.2. The Partnership may decide to participate in charitable events aimed at enhancing its image as a socially responsible business, provided that such participation aligns with this Policy and the budget and participation plan are approved by the Director.

9.3. The Partnership is entitled to make charitable contributions in the form of goods or services, technical assistance, training, or financial support. However, measures must be taken to ensure that the recipient is a legitimate charitable foundation or public organization in accordance with the Partnership's internal regulations and that the organization is not directly or indirectly managed for the benefit of a government or administrative official, an official, or closely affiliated individuals.

9.4. The Partnership, to promote its name, may provide sponsorship assistance to individuals and legal entities, provided it does not conflict with this Policy and is approved by the Director. To mitigate risks, the Partnership does not provide sponsorship assistance to government or administrative officials, public officials, or their close affiliates, as well as government institutions, state-owned enterprises, or quasi-public sector organizations. Non-profit organizations in the medical sector, fulfilling their statutory purposes, are prioritized for sponsorship assistance by the Partnership.

INTERACTION WITH GOVERNMENT/ADMINISTRATIVE OFFICIALS AND PUBLIC SERVANTS

10.1. The Partnership considers relationships with government and administrative officials, as well as public servants, to be high-risk and makes every effort to comply with the applicable anti-corruption legislation of the Republic of Kazakhstan, including anti-corruption restrictions.

10.2. The Partnership refrains from covering any expenses for government and administrative officials, public servants, and their close relatives (or in their interests) for the purpose of gaining commercial advantages in specific projects of the Partnership. This includes expenses related to transportation, accommodation, meals, entertainment, PR campaigns, or any other benefits provided at the Partnership's expense.

10.3. The Partnership may engage in business relationships with government and administrative officials, as well as public servants, only if such relationships are related to scientific and/or educational (training, awareness-raising) activities. In such cases, the government or administrative official must sign an anti-corruption commitment, and the corresponding agreement must include an anti-corruption clause.

10.4. Employees of the Partnership are prohibited from giving any kind of gifts to government and administrative officials, public servants, and their close relatives (or in their interests), except for gifts that align with established business practices and do not exceed the norms of business etiquette (such as flowers, promotional or corporate souvenirs, etc.), with a value not exceeding 2 (Two) MRP.

INTERACTION WITH COUNTERPARTIES

11.1. The Partnership and its employees are prohibited from engaging or using intermediaries, partners, agents, joint ventures, or other entities to carry out any actions that contradict the principles and requirements of this Policy, as well as the provisions of anti-corruption legislation of the Republic of Kazakhstan.

11.2. The requirements of this Policy are taken into account when establishing contractual and other business relationships with individuals and legal entities. The Partnership expects its counterparties, representatives, their governing bodies, employees, and other relevant persons to comply with anti-corruption obligations, as stipulated in the agreements with the Partnership or directly derived from the legislation of the Republic of Kazakhstan, the national legislation of the country of registration and/or operation of such persons, and international legal norms.

11.3. The Partnership takes reasonable measures to minimize the risk of business relationships with counterparties who have been or may be involved in corrupt activities. To this end, the Partnership:

- Analyzes the reputation of potential counterparties and their founders regarding tolerance for corruption;
 - Identifies potential risks related to interactions with government and administrative officials;
 - Informs counterparties about the Partnership's principles and anti-corruption requirements, including those established in this Policy;
 - Takes into account their willingness to adhere to anti-corruption principles and cooperate in preventing corrupt practices;
 - Ensures that this Policy is communicated to counterparties by incorporating anti-corruption clauses into contracts and signing anti-corruption commitments with government and administrative officials;
 - Publishes this Policy on the Partnership's corporate website.
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ACCOUNTING RECORDS

12.1. All financial and business transactions of the Partnership must be accurately, correctly, and sufficiently detailed in the Partnership's accounting records, documented, and available for verification.

12.2. The Partnership designates employees responsible for preparing and providing complete and accurate financial reports in accordance with the applicable legislation of the Republic of Kazakhstan.

12.3. The Partnership strictly prohibits the distortion or falsification of financial statements, considering such actions as fraud.

REPORTING VIOLATIONS

13.1. Employees of the Partnership must report to their immediate supervisors any instances where they are approached with requests to engage in corrupt activities.

13.2. If any employee of the Partnership becomes aware of or suspects possible corrupt activities by other employees, counterparties, or other parties cooperating with the Partnership, they must report it via the Partnership's email: info@vivamd.kz, with a copy sent to their immediate supervisor.

13.3. An employee of the Partnership will not be subject to sanctions (including dismissal, demotion, loss of bonuses, etc.) if they report suspected corruption or refuse to give or accept a bribe, engage in commercial bribery, or act as an intermediary in bribery, even if such refusal results in financial loss or missed commercial opportunities for the Partnership.

13.4. An employee will also not face sanctions if a report on potential corruption was made in good faith but was not confirmed upon verification. However, if the report was made with malicious intent—such as false accusations for personal gain or to avoid responsibility—the employee may face disciplinary actions in accordance with this Policy and applicable legislation of the Republic of Kazakhstan.

13.5. The information provided by employees is considered confidential.

13.6. The Partnership provides employees with a technical means for anonymously reporting suspected or actual corruption. Anonymous reports must include sufficient details to allow a proper internal investigation.

13.7. The Partnership also facilitates feedback on various matters related to this Policy.

13.8. The Partnership guarantees that all reported cases will be investigated; however, it does not guarantee a response to every report.

TRAINING

14.1. The Partnership promotes anti-corruption awareness by informing employees about the Partnership's anti-corruption policy and the practical application of anti-corruption procedures.

14.2. To ensure a proper level of anti-corruption awareness, all employees, including new hires, undergo remote training on this Policy and sign a corresponding commitment.

LIABILITY

15.1. All employees of the Partnership, regardless of their position, are responsible for complying with the principles and requirements of this Policy, as well as for the actions or inactions of their subordinates that violate these principles and requirements.

15.2. Violations of anti-corruption legislation and this Policy may negatively impact the Partnership's reputation and business relationships and result in severe consequences, including fines and business restrictions.

15.3. Since the Partnership may face sanctions due to corruption-related actions by its employees or counterparties, each reasonably justified suspicion or established fact of corruption is subject to an internal investigation, conducted within the framework of applicable legislation, this Policy, and internal regulations.

15.4. Individuals found guilty of violating this Policy as a result of an internal investigation may face disciplinary actions, including dismissal, financial liability, civil liability, or other legal consequences. If a court finds them guilty of violating anti-corruption legislation, they may be subject to administrative or criminal liability under applicable laws and internal policies of the Partnership.

FINAL PROVISIONS

16.1. Amendments and additions to this Policy are made as necessary in accordance with the requirements of the legislation of the Republic of Kazakhstan and internal regulations of the Partnership.

16.2. The Partnership publishes this Policy or its specific provisions on its official website, openly declares its stance against corruption, encourages adherence to this Policy by all counterparties, employees, and other relevant parties, and promotes anti-corruption awareness through information dissemination and training.

16.3. In all matters not explicitly regulated by this Policy, the provisions of applicable legislation of the Republic of Kazakhstan and internal regulations of the Partnership shall apply.

Commitment to Compliance with the Anti-Corruption Policy

of **Viva Marketing & Distribution LLP**

Full Name: _____

Position: _____

I hereby declare that I have read and understood the Anti-Corruption Policy of **Viva Marketing & Distribution LLP** and commit to complying with its requirements and restrictions.

I acknowledge that any violation of the Anti-Corruption Policy of **Viva Marketing & Distribution LLP** may result in disciplinary action, including termination of employment, as well as financial, civil, administrative, and criminal liability in accordance with the legislation of the Republic of Kazakhstan.

Date: " __ " _____ **202**__

Signature: _____