


Approved»
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CORPORATE ETHICS CODE OF “LINE SYSTEMS ENGINEERING” LLP



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TABLE OF CONTENTS		Page
1. About the document		3
2. Goals, objectives and scope of the Corporate Ethics Code		3
3. Values		4
4. Basic principles of internal relationships		4
4.1. Basic principles of relations between employees and the Company		4
4.2. Rules of conduct in the team		7
5. Basic Principles of External Relations of the Company		8
5.1. Relationships with Customers		8
5.2. Relationships with shareholders, partners and competitors		8
5.3. Relationships with representatives of public authorities and media		9
5.4. Gifts and Services		9
5.5. Environment		9
6. General style of conflict solving		10
7. Responsibility for violation of provisions of the Code		10
8. Implementation of the Code		11
9. Confidential information		11
10. Protection and use of property		11
Appendix 2: Definitions and terms		12

1. ABOUT THE DOCUMENT

1.1. Table 1. GENERAL INFORMATION

Type:	Code
Annotation:	Defines basic principles and rules of relationships between all stakeholders in the production process (rendering of services) “Line Systems Engineering” LLP
Maximum revisions frequency:	1 year
Restrictions on access:	No restrictions

2. Goals, objectives and scope of the Corporate Ethics Code

The Corporate Ethics Code of “Line Systems Engineering” LLP (hereinafter - the Code) is the internal organizational and regulatory document of “Line Systems Engineering” LLP (hereinafter - the Company), which is a set of moral and ethical standards of behavior and communication (ethics) of employees within the Company and the outside world.

Goals of the Code:

- improvement, systematization and regulation of relations of the Company to improve management efficiency and to facilitate successful interaction with employees, customers, business partners, shareholders, stakeholders and public authorities through the use of common standards and standards of business conduct;
- establishment of behavior regulation principles in complicated ethical situations;
- improving corporate culture.

Main objectives of the Code:

- create conditions necessary to achieve a balance of interests between the Company and employees, customers, suppliers, business partners, shareholders, stakeholders and public authorities to help improve efficiency, create a positive image of the Company;
- Collaborate implementation of mission and achieving strategic objectives of the Company;
- establish ethical behavior principals of employees of the Company in their activities; determine the principles of relations between employees within the Company;
- ensure awareness among employees of their personal responsibility for fulfillment of their duties and their role in delivering the mission to the Company, shareholders, colleagues, business partners and customers.

Scope of the Corporate Ethics Code:

- relationship between employees and the Company;
- behavior in the team;
- relationship between structural units of the Company;
- interaction with shareholders, partners and competitors;
- interaction with representatives of public authorities and media;
- giving and receiving gifts and services.

Code is a set of ethical principles and rules in the field of relationships with employees, customers,

suppliers, business partners, shareholders, stakeholders and public authorities, not contradicting the international law, regulations and regulatory documents, in which the team operates, namely:

- Laws of the Republic of Kazakhstan;
- Charter of the Company;
- Development Strategy of the Company;
- Collective Bargaining Agreement;
- Internal regulations of the Company;
- Documentation of Integrated Management System.

Code is a public and constantly updated document proposals for change of which can be made by every employee of the Company.

Adopting the Code, the Company confirms its commitment to a high level of corporate culture, agrees to comply with its provisions, implement and apply them in their daily activities.

Employees of the Company are required in the activity to follow the principles and rules of conduct contained in the Code.

Each employee of the Company enters into obligations to comply with the Code starting from the acquaintance.

3. Values

The fundamental values, on which the Company's activities formed, are to ensure full compliance in its activities with legislation, the Code, ethical standards and generally accepted standards of business ethics, competence and professionalism of its employees, efficiency of their work, integrity, honesty, and conscientiousness, responsibility and reliability, information transparency, patriotism, mutual aid, respect for each other, as well as acceptance and respect for the rights of all interested parties and desire to cooperate with such parties.

4. Basic principles of internal relationships

4.1. Basic principles of relations between employees and the Company

The Company supports international human rights and dignity of all employees in accordance with the Declaration of the United Nations and basic conventions of the International Labour Organisation.

We do not tolerate use of child, dependent or forced labor.

Main obligations of the Company to comply with the standards of business ethics are:

- 1) Respect for dignity, rights and personal freedom, trust relationship to employees with the provision of equal opportunities for everyone to implement their own potential;
- 2) Elimination of all forms of discrimination or harassment at workplace, facts of offensive or unacceptable behavior from the standpoint of moral and ethical values;
- 3) Fulfillment of Company's obligations to employees;
- 4) Delegation of necessary powers to every employee for the performance of their official duties;
- 5) Avoiding attempts to interfere of personal, friendly, family and kinship relationships in the implementation of the principle of equal opportunity, and their influence on making effective decision by employee;
- 6) Non-disclosure of data containing confidential information;
- 7) Avoidance of conflicts of interest;
- 8) Ensuring conditions for professional development of employees in order to achieve improved quality of work and achievement of goals;

9) Evaluation of true contribution of employees by providing them with encouragement for their achievements in the work on the basis of the goals of the Company in accordance with the internal documents.

Responsibilities, common to the leadership and employees of the Company:

- 1) Observe in their professional work norms of the legislation of the Republic of Kazakhstan, the Code, ethical standards and generally accepted standards of business ethics, implement the decisions of regulatory and other documents relating to the Company's activities;
- 2) Conform to the image of the Company;
- 3) Represent and protect the interests of the Company, make their labor contribution to the strategic goals of the Company, hold personally responsible for the quality and results of their work;
- 4) Reasonably and in good faith perform professional functions, avoiding conflict, acting with the requisite care and diligence in the interests of the Company and its shareholders;
- 5) Be responsible for fulfillment of the obligations established by this Code, regardless of the status and position, in accordance with the obligation of acceptance and compliance with the Corporate Ethics Code of the Company, in accordance with the Appendix of this Code;
- 6) Be polite and correct, respect the honor and dignity of colleagues and others, avoiding discrimination for reasons of origin, social, functionary and property status, sex, race, nationality, language, religion and other beliefs, place of residence or any other circumstances in accordance with the Constitution of the Republic of Kazakhstan;
- 7) In the performance of official duties, show modesty, follow the interests of the Company, excluding interest and use of official position for personal gain, consider unacceptable appropriation of tangible and intangible assets/wealth of the Company;
- 8) Report immediately to the head of the Company about any commercial or other personal interest (direct or indirect) in transactions, contracts, projects, related to the Company, or in connection with other matters in prescribed manner;
- 9) Respect the state and other languages, traditions and customs of the people of Kazakhstan;
- 10) By attitude to work and behavior encourage sustainable positive moral and psychological climate in the team and corporate spirit of the Company, excluding conflict situations;
- 11) Provide timely accurate information to each other with respect for confidentiality provided by law and internal documents of the Company.

Responsibilities of the leadership of the Company:

- 1) Make management decisions that meet requirements of this Code, by personal example demonstrate commitment to ethical standards established by the Company and provided by this Code;
- 2) Develop mentoring; promote team unity with common goals, values and principles;
- 3) Provide timely information about possible personal involvement in the issue being addressed and not to participate in making discussion and voting on matters in which there is a personal interest of positive solution;
- 4) Prevent with subordinates unfounded allegations, rudeness, humiliation and lack of tact;
- 5) Not to compel subordinates to commit illegal acts or misconduct incompatible with the generally accepted moral and ethical standards;
- 6) Fulfill faithfully responsibilities flatly rejecting the vicious practice of receiving (giving) gifts, wrongful receipt (provision) of the property benefits and advantages;
- 7) Act in the interests of the Company in its relations with employees, customers (users of communications services), suppliers, business partners, shareholders, stakeholders and public authorities;
- 8) When making decision follow the principles of transparency and adequacy;
- 9) Be responsible for implementing the tasks, compliance with this Code by employees of supervised subdivisions.

Obligations of the Company's employees:

- 1) Raise professional competence by studying and mastering the latest developments of new technologies, turning in the performance of tasks (if necessary) to professional assistance of colleagues;
- 2) Avoid conflicts of interests when working with customers, partners, shareholders, suppliers, competitors and other business entities;
- 3) Share positive experience of work and lessons learned with colleagues;
- 4) Follow rules of behavior in team, telephone conversations culture, standards of business and working style of dress during the performance of their duties in accordance with the provisions of the Company's internal documents;

Relations with employees are based on the principles of fairness and equality. We strive to create a working environment, where respect for the employees is manifested regardless of their individual characteristics, talents and personal qualities. No employee or applicant is discriminated against on the basis of age, race, sex, religion, disability, national origin, sexual orientation, marital or parental status, or political opinion.

We respect the right of employees to choose to be represented by a trade union for the purpose of collective bargaining. No employee, getting this right, is discriminated. All employees should know the basic terms and conditions of their employment. Legislated minimum of wage is always a minimum and not a recommended level of wages.

Each employee of the Company is considered, in the first place, as an investor, actively creating and hosting human capital.

Employees of the Company seek to develop and express their diverse quality to achieve high efficiency of performance of everyone and the Company as a whole.

For each employee the Company creates the opportunity to participate in determining the terms of cooperation.

Freedom of everyone, as an employee of the Company, is not at the expense of others.

Company's employees have responsibilities and obligations, both to themselves and to the Company and its shareholders.

Main qualities of each employee of the Company are professionalism, responsibility, determination, initiative, enterprising, modernity, striving for development, honesty, openness, fairness and respect for the high level of corporate culture.

Work in the Company involves high efficiency of activities of employees, which contributes to the conservation and continuous improvement of the competitiveness of the Company and its structures.

The Company's relationships with employees are based on principles of long-term cooperation, respect and clear fulfillment of mutual obligations.

The Company considers human capital as a source of success. We take into account personal interests of employees, pay attention to development of their potential, provision of social guarantees and compliance of value priorities.

With any change in the Company we take into account for each employee the need to adapt to new responsibilities, functions and tasks, as well as to the new team, including the use of individual measures and maintain overall friendly atmosphere. Applicable actions should be aimed at rapid establishment of effective work after the change.

Improving competitiveness of the Company in its business activities is implemented through collaboration and teamwork.

At resolving the problems, encountered in the work process, the Company's employees follow primarily: compliance with the law, justice, transparency and accountability.

4.2. Rules of conduct in the team

Relations between all employees of the Company are equal.

The main value for the Company is ability to work in a team that does not exempt employees from personal liability for breach of the rules prescribed by the Code.

In all business situations, in the first place, we follow the principle of observance of interests and image of the Company, including in respect of all employees.

Employees of the Company shall not allow degradation of personality and professional image of their colleagues.

Cohesion and participation of employees of the Company allows solving problems in a fast and low-cost way, which increases competitiveness of the Company and its attractiveness in business environment.

When communicating on business issues we do not allow on the part of employees personal influence from either side, as well as making decisions, not corresponding to standards of ethics.

Basis for the creation, development and efficient operation of the Company is the availability of information-intensive environment where the Company's employees have opportunity to communicate on business issues, which ensures efficiency, exchange completeness and provision of information for each employee. Therefore we encourage intensive communication of employees in information space of the Company, presence at personal meetings, and exchange of views on important issues. This communication is intended to strengthen the Company's corporate culture and increase effectiveness of its activities.

Informal (without fixing conflicts in writing) solving the business problems between employees of the Company is allowed, if it facilitates the most effective work.

The Company welcomes various forms of communication of employees - joint implementation of projects, discussion and resolution of operational issues, drawing-up new areas for development, as well as joint organization of cultural and sports activities.

Employees of the Company undertake to take reasonable care of their actions do not harm others, to fulfill legal requirements, including environmental, health and generally accepted standards of morality.

5. Basic Principles of External Relations of the Company

One of the main tasks of the employees of the Company is justification of trust and expectations of partners and customers of the Company. Each employee of the Company is a worthy representative of the Company.

Employees of the Company are focused on effective joint operations and attention to partners, customers, competitors.

5.1. Relationships with Customers

The basis of our business is the Customer. Our goal is to continuously increase the value we bring to the Customer's business by improving quality of existing services. The starting point of our activities and our development is a better understanding of the Customer's business and their interests. The main thing for us is the trust of the Customer.

The Company in good faith and carefully fulfill its obligations in respect of the Customer and is committed to provide high quality services by complying with adopted standards.

The Company provides security and protection of information about cooperation with its Customers.

The Company constantly improves the quality of services, in a timely and careful manner considers such uncertainties, solves the claims of the Customer.

5.2. Relationships with shareholders, partners and competitors

External Relations of the Company are based on the principles of mutual respect, openness, commitment

and responsibility.

The Company is interested in establishing business partnerships for development and improvement of relations with shareholders, partners and competitors. In the process of interaction the Company expects responsible and consistent performance of its obligations and implementation of commitments from its partners.

The Company's activity is focused on long-term and effective cooperation with our partners, customers and shareholders.

The Company values its reputation and image.

In all areas of its business, the Company is committed to partnership, fair, free and open competition.

In case of disagreements and disputes the main way for their solution is negotiations and search for compromise.

The Company builds relationships based on respect for the law of the Republic of Kazakhstan, the Company's internal regulations, rules and regulations of business ethics and the Code.

The Company is committed to promote principles of the Code and its adoption by contractors.

5.3. Relationship with the representatives of public authorities and media

The Company builds and maintains with representatives of public authorities respectful, constructive and transparent relationship, excluding conflict of interests and based on the observance of the legislation of the Republic of Kazakhstan.

To achieve its goals, the Company does not apply fraudulent misconduct attempts to influence the decision making by the representatives of government agencies and officials.

The Company is a law-abiding taxpayer, on time and in full pays taxes and provides reports and information about their activities.

The Company follows the principle of non-disclosure of insider information about the Company's activities.

The Company strives to ensure high standards in cooperation with the media. Communication with the media is allowed only for authorized representatives of the Company.

Employees of the Company do not disseminate false information, dissemble or misrepresent material facts, use information obtained in the course of their duties for other purposes in its operations in relations with the media.

5.4. Gifts and Services

The Company's employees are strictly not allowed to accept or transfer any gifts or services in any form from the Customer of the Company or third parties as a thank for perfect service or advice given. Receiving money as a gift in any form is strictly prohibited, regardless of the amount.

The company does not accept corruption. Gifts should not be used for giving/getting bribes or corruption in all its manifestations.

5.5. Environment

The Company is committed to conducting business with a view to preserving the environment. We contribute to global sustainability through development, promotion and use of resource-saving and environmentally-friendly services and strive to reduce the impact of our activities on the environment. We constantly look for opportunities to use the most of the best practices and synergies of our businesses.

In our Company we efficiently use raw materials and energy in order to reduce waste and carbon emissions.

Together with our partners and customers, we strive to reduce greenhouse gas emissions, thereby fighting climate change.

6. General style of conflict solving

The Code does not attempt to describe all possible conflicts of interest that may arise. It should be used in situations where the employee's personal interest is in conflict with the interests of the Company, or when the employee may be considered as a recipient of illegal personal benefit as a result of his position.

All Company's employees strive for conflict-free activity, treating with respect interests, priorities, professionalism, gender and ethnic relations of each employee, partner, customer, and others.

Areas of potential conflict are quickly identified, minimized, and put under strict control.

Effective functioning of the Company is based through the determination of areas of responsibility and duties of employees, and elimination of situations where the area of responsibility of employee allows conflict of interests.

Conflict solution is done in such a way that the potential damage to the Company's operations is minimal. The conflict is resolved as soon as possible.

Conflict situations are solved by the heads of departments of the Company, and if it is necessary by the Director of the Company.

We welcome the conflicts solving by means of constructive negotiations and prevention of potential conflict situations.

When solving a conflict, the principles of professionalism, openness, fairness and honesty are followed.

In the event of a conflict with external entities, employees are given the interests of the Company and are required to notify the Director of the Company.

None of the structures of the Company and none of the Company's employees are allowed to use the exceptional status to resolve the conflict in their favor.

7. Responsibility for violation of provisions of the Code

Following the standards of the Code by the Company's employee is an important element for a comprehensive and objective assessment of his personal and professional competencies.

Each employee of the Company, undergoing criticism of the Managers or colleagues about the ethics violations of professional conduct, has the right to demand an objective internal investigation of admitted derogations from the rules of the Code.

At request of the employee of the Company or at request of his manager, the investigation may be kept confidential.

For the commission of the offense, which undermines the reputation of the Company and the employee, the Director of the Company may raise the issue of non-compliance of the employee's high status of the Company. Then the decision is sent to his direct manager to consider the possible involvement of the employee to disciplinary responsibility, as well as the evaluation commission for consideration, along with other materials to assess the employee during his certification for office compliance.

Corporate culture and ethics of relationships are equally a priority and an area of responsibility of each employee of the Company.

Violation of the provisions of the Code is considered as an action incompatible with the status of the employee of the Company.

8. Implementation of the Code

All of the Company's employees, regardless of position, must strictly comply with the rules and requirements of the Code.

All of the Company's employees must be familiar with the provisions of the Code and trained how to use it in day-to-day work.

The new employees get acquainted with the Code in accordance with established procedures (in the form of compulsory instruction, signing the reference sheet, attached to the Code). The Code is available to all employees on the internal Web-resource of the Company, which is <http://linesystem.kz/cm/startswith.html>

In conflict situations related to compliance with the Code or unethical conduct of employee of the Company or colleagues, employees of the Companies may apply to their direct manager, and if it is necessary, to the Director of the Company.

The Company's employees should strive to promote investigation of ethics violations, provide materials and documents necessary to verify the circumstances of such violations.

Harassment of employee of the Company, who claimed a violation of the Code, is considered to be violation of the Code.

9. Confidential Information

Employees of the Company have access to confidential information which is the property of the Company, and in some cases - to information held by third parties within established authority (financial information, information about customers and their contact details, and other information).

Employees of the Company are required to protect confidential information and prevent its use for personal gain and other personal purposes. Use of confidential information for personal gain is a violation of the Corporate Ethics Code.

In accordance with the laws of the Republic of Kazakhstan and internal documents of the Company, managers and employees are prohibited from disclosing commercial, official or other secrets protected by law.

Managers and employees of the Company must comply with the rules and procedures provided by the internal documents of the Company and ensuring security when dealing with confidential information.

10. Protection and use of property

Employees of the Company must provide protection and safety of the property and resources of the Company, as well as their proper and effective use. Employees of the Company take all measures to prevent negligent, illegal or ineffective use of resources of the Company.

Appendix. Definitions and terms.

Corporate ethics	A set of moral and ethical standards of behavior and communication (standards of ethics) of employees within the Company and outside world.
Standards of ethics	Moral and ethical rules of conduct of employees of the Company.
Corporate culture	System of formal and informal rules and norms of behavior, attitudes and values that define the attitude of the staff with customers, leadership, the Company and its competitors.
Leadership of the Company	Director of the Company and his deputies in disciplines.
Corruption	Term usually denoting the use by an official of his powers and rights entrusted for personal gain, contrary to the laws and moral precepts.
Conflict of interests	Situation in which personal interests of the employee, in the execution of his duties, may conflict with the interests of the Company.
Gender Factor	Factor that determines the equality of rights and opportunities for men and women, equal sharing of responsibilities, workload, income, access to economic and intellectual resources and decision-making.
Human capital	Knowledge, abilities, skills that can be exercised by the employees.