



# Getting Results the Right Way

## TCO's Business Conduct and Ethics Expectations for Suppliers and Contractors

The TCO Way explains who we are, what we do, what we believe and what we plan to accomplish. It establishes a common understanding not only for those of us who work here, but for all who interact with us.

At the heart of The TCO Way is our vision...to be the safest, most efficient and profitable oil and gas enterprise in the world. Inherent in our vision is an organization that:

- Possesses superior capabilities and commitment;
- Delivers world-class performance in Health, Safety, Environment, Reliability and Efficiency;
- Earns the respect of all our stakeholders, investors, customers, host government, local communities and our employees not only for the goals we achieve but how we achieve them.

Suppliers and contractors play a vital role in our success and we rely heavily on them to help us deliver top tier business results. At TCO it's not only about delivering business results; it is about delivering them the "right" way, The TCO Way, in a sustainable manner.

### Values

Our Company's foundation is built on our Values, which distinguish us and guide our actions. We conduct our business in a socially responsible and ethical manner. We respect the law, support universal human rights, protect the environment, and benefit the communities where we work.

### Human Rights

Company's conduct is consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights. TCO encourages its suppliers and contractors to treat their employees and to interact with communities in a manner consistent with the International Labour Organization's core labor principles, including the elimination of forced and compulsory labor and the abolition of child labor.

### Compliance and Anti-Bribery

At TCO, we comply fully with applicable legislation, and we expect our suppliers and contractors to conduct their business in compliance with these requirements as well. Bribery of any government official in any country is strictly against company policy, even if the refusal to make such a payment would result in the loss of a business opportunity. TCO complies with the RoK, U.S., U.K and other applicable international anti-corruption laws. We expect our suppliers and contractors to do the same.



### Operational Excellence: Safety, Health, Environment, Reliability and Efficiency

Company is committed to maintaining the safety and health of people and the quality of the environment where we operate and complying with the letter and spirit of all environmental, health and safety laws and regulations. Our Operational Excellence Management System (OEMS) defines expectations with regard to the systematic management of process safety, personal safety and health, environment, reliability and efficiency to achieve world class performance. We manage supplier and contractor adherence to Operational Excellence through contractual agreements.

Company expects its suppliers and contractors to:

- Conduct their business in a manner that protects people and the environment;
- Comply with all applicable Company policies and requirements, and with all applicable environmental, health and safety laws and regulations.

Additionally, Stop Work Authority is a key part of TCO's culture and we all have the responsibility to stop work – or not start work – if hazards or risks could pose a threat to safety or the environment.



### Cost Management

TCO seeks to build long term partnerships with its suppliers and contractors based on sustained performance, quality and lowest total cost. We expect our supply base to pursue continuous improvement in the areas of process efficiency, technology and supply chain effectiveness while complying with their contractual obligations. We require our employees, suppliers and contractors to work professionally through relationships built on trust, respect and clear communication. TCO is committed to sustaining cost discipline in our business, and we expect the same from our suppliers and contractors.

### Conflict of Interest

We expect our employees, customers, suppliers and contractors to avoid conflicts of interest in all business decisions which should be impartial and based on sound business reasoning.

To avoid a conflict of interest, our employees and directors are prohibited from giving or receiving gifts or entertainment of anything more than nominal value, or cash in any amount.

Accordingly, we require our suppliers and contractors to refrain from giving to or receiving from any TCO employee or director any gift, entertainment or other favor of more than nominal value, including any commission, fee or rebate. Suppliers and contractors are also prohibited from entering into any business relationship with any employee, director of TCO, or their companies, without prior written consent from TCO.

### TCO Hotline

The Company is committed to appropriate conduct by its employees, suppliers and contractors and requires questionable conduct to be reported. This may include, for example, violations of the Company Business Conduct and Ethics Code, company policies, and applicable laws or regulations.

The Hotline is a confidential, 24-hour, 7-day-a-week service. The Hotline has been set up for employees, suppliers and contractors as a risk-free way to report activities that may involve violations of the law or Company policies. The Company does not tolerate any form of retaliation for reports made in good faith to the Hotline. Hotline Reports can be made as follows:

- Report your concern in Kazakh by dialing local phone 8-800-080-2030 or 8-7122-27-26-76
- Report your concern in other languages, including Russian and English, by dialing local phone 8-800-080-3015 or 8-7122-27-26-86