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Code of Conduct

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**It is processed by independent Operator on the basis of confidentiality and anonymity.*

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Message from the President & CEO



Air Astana's mission is a statement of intent to build one of the finest airlines in the world.

*The goals and values define how we believe we can do this. We employ a large number of highly skilled people across many countries and continents of many nationalities, ethnic backgrounds, faiths, beliefs, and life choices. This stimulating environment is a key reason why we have chosen to work in this industry. However, it means that maintaining clear focus on common goals – vital to our success – can be complex. In order for us to be successful, **our ethical standards and behavior towards each other needs to be exemplary.***

Whilst it is impossible for any Code of Conduct to cover every eventuality or situation, the document which you now hold broadly defines how we should conduct ourselves.

I hope it is useful. Please read it carefully.

*Yours sincerely,
Peter Foster*

1. Code of Conduct

1.1. The Company values

This Code of Conduct sets out our values as well as basic standards and principles of behavior, adherence to which are vitally important to both the reputation and success of our Company.

In pursuit of our mission and strategic goals success depends on us maintaining our corporate values, standards, and reputation and every employee has an important role to play.

The Company Values below guide all our actions and decisions. Our behavior is what people see and experience when they interact with us. That is why it is so important that we apply these values to everything that we do.

Our Values:

Hospitable

We treat every person with whom we come into contact, customer or colleague, as a guest. We are warm, friendly and tactful, always willing to help.

Efficient

We are professional people who produce high quality results with knowledge and style. We maximise our skills and use our time efficiently.

Active

We anticipate and respond to the needs of customers and colleagues. We do things to the very best of our ability and are always looking for ways to improve.

Reliable

We produce reliable and consistent quality in all of our activities. We always keep our promises.

Trustworthy

We are honest people who never compromise our integrity. Customers and colleagues can trust us.

Our Mission: From the Heart of Eurasia we are building one of the finest airlines in the world.

Our Goals:

1. We implement the highest safety standards.
2. We are and must be the most reliable airline in the region with the highest standards of customer service.
3. We profitably grow and improve our fleet, route network and product.
4. We work to the highest standards of integrity and business ethics.
5. We recruit, appraise and reward staff based on merit and enable them to develop to their maximum potential.
6. We are a socially responsible organisation.
7. We are a global ambassador for Kazakhstan.

As individuals, collectively as teams and as a Company, we will always:

- maintain a professional and respectful work environment, adhere to ethical norms in the workplace and foster mutual respect and dignity;
- take personal responsibility for implementing the standards in this Code and comply with all Company policies and processes, failure to do so may result in disciplinary action, including termination;
- comply with applicable laws and regulations and contract requirements as a minimum. In the many instances where we set our own higher standards, we will apply these first;
- respect the human rights of our employees in the workplace and the communities in which we operate;
- seek guidance where we are unsure of the appropriate course of action

1.2. Company Commitment

The Company commits that its leaders, managers and supervisors will:

- act with integrity, serving as role models for the high standards of conduct expected throughout the Company;
- promote ethical conduct, both within the Company and in the markets in which we operate;
- provide training and other resources so that employees are equipped to deal with ethical issues;
- make sure this Code is provided to, explained to and understood by employees they manage and supervise;
- foster an open work environment in which employees are encouraged to raise questions or concerns without fear of retaliation or retribution;
- take action to address concerns of ethical misconduct.

1.3. What is a Code of Conduct?

The Code of Conduct is a summary – in one document – of the principles and standards of business conduct expected of all employees wherever we operate, providing us with practical guidance on how to deal with important ethical issues.

As such, the Code sets the standard that every employee is expected to meet. It is also intended to provide general guidance on situations that may arise in our day-to-day activities on behalf of the Company. This document also tells us where we can get more detailed information on any of the topics covered, and who we can ask for help with resolving problems.

The Code is intended to be a guide as it cannot describe every law, policy or process that may apply to us or every situation that we may face within our everyday role.

As a general rule, we are responsible for understanding and complying with the laws, regulations or policies that relate to our business activities.

1.4. Who does the Code of Conduct apply to?

This Code applies to and is mandated for all bodies, executives and employees of our Company.

Each of us, wherever we work, must behave in accordance with these standards when dealing with fellow employees, customers, suppliers, contractors, stakeholders and competitors.

We expect our business partners, contractors, suppliers and other third parties to comply with our standards and principles set out in this Code. When appropriate, we should provide a copy of this Code to non-Air Astana employees and ask that they comply with our standards and principles.

1.5. Compliance with the Code of conduct

All Air Astana employees shall comply with the standards set out within this Code. These standards are clearly laid out at the beginning of each section throughout this Code. These standards are also included in the relevant Air Astana policies. A failure to comply with the Code amounts to a failure to comply with Air Astana's policies and processes, and will be treated accordingly.

1.6. What about the different laws in different countries?

Air Astana delivers business worldwide and we are committed to complying with the laws and regulations of all the countries in which we work. Each of us is responsible for understanding and following local laws in the places where we work or do business. Sometimes these laws may be less restrictive than our own standards. In such cases, we will always follow our own standards.

1.7. Who can I talk to if I have an issue or concern?

The Code cannot cover every situation that we may face. We may find ourselves faced with a dilemma that we are not sure how to resolve. If in doubt ask yourself these questions:

- Is it consistent with Air Astana's values?
- Does it comply with the Air Astana's Code of Conduct?
- Does it comply with policy, regulation and law?
- Would I be setting a good example?
- Would I be comfortable explaining what I did to my colleagues, family and friends without shame or embarrassment?
- Would I or Air Astana be comfortable if the action was written about in a newspaper?
- Have I consulted others who have knowledge of the topic and sought advice to help me make an informed decision?

If the answer is 'No' to any of these questions, or if you are not sure, stop and seek further advice.

There are a number of ways that you can seek advice and support, including through any of the following:

- your manager;
- someone else in your management structure;
- your Business Partner;
- your Legal department;
- a Compliance Officer;
- the Hotline (for reporting of the related issues).

It may be as simple as talking to the person concerned, or discussing the options with a trusted colleague.

Do not let any concerns go unresolved. If you report apparent misconduct honestly, and in good faith, you will be supported by the Company.

Employees should report any infringements of the Code as soon as possible.

See also

- [\[Speak-Up Policy\]](#) and
- [\[Hotline contacts\]](#) on the front cover of this Code and the Company's website

1.8. Where can I raise an issue or concern?

A hotline is available in the Company. You can use it if you:

- want to tell us about situations where you think our standards or the law may not have been upheld;
- think an issue or concern that has been reported is not being dealt with properly.

Calls to the hotline are free (KZ) and lines are open 24 hours a day, seven days a week. The Hotline contacts are shown on the cover page of this Code and corporate website of the Company.

If you are unsure of how to handle a situation or have a question, you may contact Compliance and Sustainability Department.

1.9. What if I am afraid of retaliation of retribution?

Air Astana is committed to ethical business conduct and encourages all employees to seek advice or raise their concerns about business conduct-related issues. We will not tolerate adverse action against anyone for raising an issue or concern in good faith. By adverse action we include where an employee is discharged, demoted, suspended, threatened, harassed, excluded or deliberately marginalised.

Any manager or employee found to have retaliated against another for raising an issue or concern in good faith will face disciplinary action.

See also the [\[Speak-Up Policy\]](#)

2. Our relationship to each other and to safety

2.1. Inclusive workplace behavior

Our standard

We each contribute to creating an inclusive work environment, where individuals are respected and where the value of having a diverse workforce is recognised.

What it means to me

Our Company brings together people from a wide variety of backgrounds, origins, experiences and cultures. It is our responsibility to respect and value others as we would expect to be respected and valued ourselves.

It is important that we maintain high ethical standards, and reflect the customers we serve and the communities in which we operate.

We aim to create high performing teams which benefit from their diversity. To achieve this, we create an inclusive work environment where the recruitment, employment, promotion and development of people based on qualifications, skills and competency to do the job. Our decisions and actions should not be based on personal bias or prejudice.

2.2. No harassment or other forms of pressure in the workplace

Our standard

We are committed to maintaining a creative, diverse, inclusive and supportive work environment and do not tolerate discrimination or harassment against employees or non-employees with whom we have a business, service or professional relationship.

What it means to me

We do not tolerate any form of discrimination based on religion (including religious clothing and grooming), race, ethnicity, gender, age, political opinion, marital status, gender identity, gender expression, sexual orientation, ancestry, citizenship, disability, medical condition, or any other reason prohibited by law, as well as any form of harassment, intimidation, violence, including sexual harassment, verbal, non-verbal and physical abuse.

Sexual harassment or any act that may be perceived as sexual harassment is unacceptable, as is any form of unwanted verbal or physical behavior of a sexual nature.

Abusive, humiliating or intimidating behaviour is never acceptable. We each have a personal responsibility to make sure we neither behave this way ourselves, nor allow others to do so.

When we observe inappropriate or unacceptable behaviour, we have an obligation to do something about it. This may mean talking to the person or people involved; discussing the matter with our line manager; seeking specific advice from one of the many resources available to us (see section 1.7) or reporting the matter confidentially through the Hotline.

We also do not tolerate retaliation against anyone who speaks, reports, or participates in an

investigation related to discrimination, harassment, retaliation, sexual harassment, or any inappropriate behavior. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion, or other actions that may discourage someone from asserting their rights.

2.3. Health and Safety

Our standard

We have a personal and collective responsibility to maintain a healthy and secure workplace and to promote safe working practices.

What it means to me

Our working environment and operations can have an impact on the health and safety of our employees and others we work with. We have a responsibility to make sure we limit the potential for accidents to occur.

Complying with safety rules and procedures is an essential minimum. We should also aim to prevent accidents happening by understanding the risks present in our workplace and daily operating environment, and by understanding how accidents can occur. We should all seek to identify those areas that can be improved to protect the safety of all those in our places of work. The register of risks and hazards in the workplace is updated annually (Hazard identification).

Each of us has a responsibility for safety in the workplace. We must:

- be familiar with and comply with the Company's relevant policies and all local requirements;
- think through the risks and hazards in our workplace and daily operating environment;
- intervene immediately if someone is putting themselves or others at risk;
- report all safety risks promptly to a manager or Health and Safety & Environmental division in the form of a report in the IQSMS (Integrated Quality and Safety Management System).

It is essential that access arrangements at our facilities are strictly observed by employees, contractors and visitors. This will help to make sure our workplace remains safe and secure.

See also:

- [Occupational Health and Safety and the Environmental protection management system Policy]
- [H&S rules on visiting operational areas]

3. Our responsibilities in the workplace

3.1. Working with Others

Our standard

We encourage our suppliers and other business partners to adopt the same or similarly high standards of ethical behaviour.

What it means to me

We work with many different business partners and their behaviour and the way they operate can affect our own reputation. We recognise that maintaining constructive working relationships with others can benefit our business and our professional integrity. We must make sure we maintain our ethical standards and behave respectfully when working with others.

We will encourage our business associates, suppliers and joint venture partners to adopt the same or equivalent standards of ethical business conduct as set out in this Code.

We will promptly report – in the same manner we would for a Company internal matter – any behaviour by a supplier or other business partner that does not match our ethical standards.

We recognise and are committed to respecting the human rights of our employees in the workplace and the communities in which we operate.

3.2. Bribery gifts and entertainment

Our standard

We do not offer, give or receive bribes or inducements for any purpose whether directly or through a third party.

What it means to me

Even the suggestion of corruption may damage the reputation of the Company and affect its ability to do business. It may also bring the personal integrity of individuals into question. Employees, advisers, consultants, distributors, joint venture partners or anyone else who may be acting on the Company's behalf must not offer, give or receive bribes or corrupt payments. A bribe includes any payment, benefit or gift offered, given or received with the purpose of improperly influencing a decision or outcome. The payment may not necessarily be of large value. It could be as simple as a lunch or an invitation to a sporting event.

We will not offer, give or receive any payment, benefit or gift which is intended or may be construed as a bribe. We are each responsible for knowing what our business guidance allows and what the law permits in our own country of operation regarding gifts and benefits given to or received from government officials, customers, suppliers or other third parties. If we are unsure then we should always seek guidance before proceeding.

Always seek guidance before accepting or giving any gift or hospitality and record it in the relevant gifts and hospitality register, when required.

See also the [\[Anti-Corruption Policy\]](#)

3.3. Accounts and Records

Our standard

Honest, accurate and objective recording and reporting of information, whether financial or non-financial, is essential to the Company's governance, credibility and reputation.

What it means to me

Our Company keeps true and complete financial and business records. All financial data, books and records are capped in accordance with International Financial Reporting Standards, national laws and internal regulations.

We record all transactions, expenditures, revenues and all other aspects of the Company's business accurately in timely manner and in accordance with our accounting, expenses and record keeping policies.

We never create or participate in the creation of records that are misleading or artificial.

See also

- [the Accounting Policy];
- [the Business Trips Rules];
- [the Procedure for acceptance of goods and services]

3.4. Use of Company IT

Our standard

We use Company information technology (IT) facilities appropriately and responsibly. We will also carefully consider how we refer to work/business activities when using social media.

What it means to me

Company IT facilities may be defined as including, but not limited to:

- laptop and desktop computers and network connectivity enabling devices;
- IT services such as email, data storage and internet access;
- mobile computing devices such as smartphones and tablets;
- Company information stored on authorised personal devices.

Company devices or networks should never be used for any illegal or socially unacceptable purposes. No unlicensed software should be installed or requested to be installed on computers of the company. IT resources of the company should be used with utmost care ensuring that there is no breach of Information Security Policy of the company; resources are used efficiently and cost effectively; there is no possibility of leakage of confidential information of the Company.

Whether through Company or personal computing devices, in work time or personal time, personal or company IT resources with should be used with caution and care especially when it is foreseeable that such usage can have an impact on the Company.

We should use restraint and consider the risk to the Company, our customers, our colleagues and ourselves because any information posted to the internet can become instantaneously accessible globally, permanently available and open to being republished in other media.

See also [the Information Security Policy]

3.5. Use of Company physical assets

Our standard

We protect all Company equipment and property in our care from loss, disclosure or misuse. We have the same responsibility for the assets in our care belonging to customers and other third parties.

What it means to me

We are each responsible for protecting any equipment and property to which we have access to or have been entrusted to safeguard, whether that equipment belongs to the Company, our customers or other third parties. We need to make sure that these assets are not compromised, lost, damaged, misused or wasted. You should not loan, transfer, sell or donate these assets without authorisation.

We can meet this responsibility in a number of ways, including:

- using the equipment only for authorised purposes;
- ensuring it is regularly maintained;
- physically securing the equipment when not in use;
- keeping good inventory records, including customer and third party required reports;
- raise the issue concerning safety of property at various internal meetings and discussions

3.6. Personal Information

Our standard

We ensure all personal information is handled appropriately, safeguarding individuals' privacy and following all relevant Company processes and applicable data protection laws and regulations.

What it means to me

When you entrust the Company with personal information, all reasonable measures and safeguards will be taken to ensure that our personal information is kept safe and secure.

We only allow access to our personal information to those who have a valid business reason for accessing it, reducing the risk of our personal data being compromised.

See also [[the Regulations on Personal Data](#)]

3.7. Business Information

Our standard

We protect information that is proprietary to our Company and information in our possession that is proprietary to other parties.

What it means to me

Proprietary information includes technical and non-technical internal information which is used by the Company in its business and which we protect from disclosure. The unauthorised use of such proprietary information – including that of competitors, customers, or suppliers – is not permitted.

To protect such information we need to take a number of steps, including:

- only disclosing it outside the Company on a need-to-know basis as part of an established confidential relationship or a formal agreement governing the use and security of the information;
- never sharing proprietary information from a previous employer;
- proprietary information should only be stored within the Company's approved facilities/IT infrastructure and must be appropriately marked

See also:

- [the Information Security Policy];
- [the Regulations on Confidential Information]

3.8. Customer Confidential Information

Our standard

We handle customer Confidential and/or Protectively marked information in accordance with the applicable laws, regulations, policies, industry standards and processes.

What it means to me

Improper or unauthorised handling of classified and confidential information may damage the companies with which we do business. It also damages our reputation and may harm the operational and financial performance of the Company.

This means we have a responsibility to:

- handle Classified and/or Protectively marked information in accordance with all applicable laws and local procedures;
- not discuss classified information with anyone unless we have confirmed that they have the appropriate clearance and a need to know and we are in a secure place

See also [the Information Security Policy]

3.9. Conflicts of interest

Our standard

We disclose and seek direction on any issues that may potentially conflict with our responsibilities to the Company.

What it means to me

When a conflict of interest arises it can cast doubt on our integrity. It can also have a

damaging effect on the reputation of the Company.

Conflicts of interest are situations in which competing interests may impair our ability to make objective and unbiased business decisions on behalf of the Company. These situations can take many forms, with examples including managing or recruiting a close friend or family member, having a second job, holding financial interests in suppliers or competitors, or serving on the board of directors of another company operated for profit without Air Astana's approval. We may, however, serve on the boards of community, government, educational, civic or other non-profit organisations, provided that such participation does not interfere with our duties as an employee.

Potential conflicts of interest should be avoided or carefully managed. In all cases, we must disclose a potential or actual conflict as soon as we become aware of it. The issue will be discussed in a straight forward manner, and be recorded and resolved as soon as practically possible.

See also [\[the Conflict of Interests Policy\]](#)

4. Business Responsibilities

4.1. Product Safety

Our standard

We work to maintain the highest standards of safety in our business

What it means to me

We work to the highest industry standards of safety. We will not agree, however, to a level of safety that is unlawful or unethical.

Our policies and practices are built on a set of principles of product safety that apply throughout the operations.

The safety of our business relies on the application of our safety policies and processes, and on the behaviours and attitudes of each of us. We have a chain of accountability for safety and are responsible for ensuring that we meet the agreed level of safety.

We should make ourselves aware of the safety implications of our roles and ensure that we are operating in full compliance both with the law and with our own business unit's safety policies and processes. Any concerns regarding safety, or the application of policies and processes, should be raised immediately with your manager or Corporate Safety Compliance.

4.2. Respect for human and labor rights

Our standard

We strictly adhere to the principles set forth in the International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. We believe that these international standards are fundamental to creating a fair and honest business

environment and to ensure that the rights and dignity of every individual are respected.

What it means to me

Each of us has all rights and freedoms without any form of discrimination on the basis of race, color, sex, language, religion, political or other opinions, national or social origin, property, estate or other status.

We do not tolerate any discrimination based on personal characteristics in relation to all stages of employment, including the application process, hiring, promotion, compensation, access to training, appointment, salary, benefits, discipline, termination and/or retirement.

Each of us has the right to participate in peaceful assemblies and join associations and trade unions to protect his own interests.

We recognize the right of our employees to participate in political activities in support of political groups, candidates or government officials. However, such participation must be voluntary and carried out in the personal time of employees, at their own expense. It is important that it is clear that the employee is acting on his own behalf and does not represent the interests of the Company. We respect the personal freedom and political views of our employees and do not force them to participate in or refrain from political activities.

We do not tolerate any violation of human rights. We are against slavery and the slave trade, torture, inhuman treatment, the use of physical punishment as disciplinary measures, forced child labor, human trafficking in any forms. We condemn all forms of child exploitation and do not use child labor.

4.3. Dealing with third parties

Our standard

We always behave ethically when dealing with our business partners and competitors.

What it means to me

Honesty, integrity, legitimacy and openness underpin our business.

They clearly apply to our dealings with customers, suppliers, consultants and business partners. We select our business partners, and purchase materials and services based solely on legitimate business considerations, such as price, quality, reputation and benefits for our Company. We observe the laws, rules and regulations that apply to procurement activities. We will not knowingly make any untruthful or inaccurate statements, communications or representations.

We compete fairly and strictly adhere to antitrust laws and competition laws in all countries where we are present. When we discuss business opportunities with other companies, we will refrain from discussing or agreeing to fixing pricing, market sharing, allocating customers, restricting capacity.

We will report any inquiries made to us in connection with such activities to **Compliance and Sustainability Department**.

See also:

- [\[Anti-Corruption Policy\]](#);
- [\[Procurement Policy\]](#)

4.4. Facilitation payments

Our standard

We do not make facilitation payments.

What it means to me

A facilitation payment is a payment or gift given (usually to a government official) to speed up a procedure or to encourage one to be performed. It does not include fees required to be made by law such as the payment of a filing fee for a legal document. The Company's position on such payments is clear. We will:

- not make facilitation payments;
- not allow others to make them on our behalf;
- report any requests to make facilitation payments;
- take action to combat the practice of facilitation payments

See also:

- [\[Anti-Corruption Policy\]](#);
- [\[Procurement Policy\]](#)

4.5. Environment

Our standard

We are committed to high standards of environmental management.

What it means to me

We have a personal, collective and social responsibility to use resources efficiently and to minimize the short, medium and long-term impact of our products and operations on the environment.

In doing this, we need to comply with the law and relevant environmental regulations where we are operating.

We should all be aware of the Company's Occupational Health and Safety and the Environmental protection management system Policy and make sure we apply it, as appropriate, in all aspects of our work.

See also:

- [\[Occupational Health and Safety and the Environmental protection management system Policy\]](#);
- Intranet (KC people) of the Company

4.6. Community investment

Our standard

We will make a positive social and economic contribution through our activities to the communities in which we work, and we support, sponsor and contribute to the activities of other organisations, where they are aligned with our own business objectives, our values and will enhance the reputation of the Company.

What it means to me

We contribute to charities and good causes through sponsorship and donations and by providing materials.

We encourage our employees to give their time as volunteers to these causes.

When making sponsorship commitments, charitable donations or promises of 'in-kind' support – such as Company materials or resources – prior approval is required and the activity must be recorded in accordance with our policy. All requests for sponsorship and charitable donations received must be referred to your Communications department to ensure that they meet our sponsorship and charitable giving criteria.

See also [[the Community Investment Policy](#)]

4.7. Share transaction and inside information

Our standard

We will safeguard share price-sensitive information and will not deal in shares or encourage others to do so when in possession of such information.

What it means to me

Occasionally, some of us may receive confidential information about the Company and its business that – if made public – would be likely to have a significant effect on the value of the Company's shares or those of another company. This information is commonly known as 'Inside Information'. When we are in possession of such information, we must not deal in the shares of the Company to which such information relates.

In addition, we should never give inside information to anyone else – whether to other employees (unless specifically authorised to do so by the Company), family members, friends or business associates – or encourage them to deal in shares based on such information.

See also [[Guidance on Inside Information & Dealings in the Company's Shares](#)]