

**Supplier Code of Conduct of the
Air Astana JSC group of companies (tender.airastana.com)**

A. GENERAL PRINCIPLES

1. Scope of coverage

The Code of conduct applies to all Suppliers, including potential and existing counterparties, subcontractors, agents and other third parties acting on behalf of the supplier (hereinafter referred to as the Supplier).

It covers all types of supplies, works and services, regardless of jurisdiction or location, when interacting with the Air Astana JSC group of companies.

Air Astana JSC group of companies (hereinafter referred to as the Group) is an association of interconnected organizations, including Air Astana JSC, FlyArystan JSC and other subsidiaries operating under a single management and sharing common goals, values and business standards.

2. Purpose

This Supplier Code of Conduct (hereinafter referred to as the “Code”) has been developed to establish unified principles of transparent, ethical and sustainable interactions with Suppliers.

The Code reflects the Group's commitment to international standards of business ethics, the reduction of operational risks, the protection of the interests of customers, shareholders and partners, also the achievement of strategic goals in the areas of quality, sustainable development and innovation.

An important part of the Group's approach is the integration of environmental, social, and corporate responsibility (ESG) principles into all business processes. We prioritize carbon footprint reducing, sustainable procurement, responsible waste management, climate risk transparency, and employee well-being. Group supports partners who share these values and committed to responsible business practices.

Suppliers compliance with this Code is essential to maintaining a high level of trust, supply reliability and the Group's reputation. Suppliers acting in accordance with the Code contribute to achieve sustainable results, effective risk management, regulatory compliance and strengthening partnerships. This enables the Group to realize its ambitious expansion plans, ensuring stable and secure supplies in the face of increasing customer demands and international markets.

B. CODE STANDARDS

3. Compliance with Law and Business Ethics

Compliance with Law

Supplier must comply with applicable laws and regulations, including labor, health and safety, environmental, anti-corruption and tax laws, as well as sanctions and personal data protection requirements.

Transparency and Ethics

Supplier must adhere to high ethical standards and exclude any form of corruption, fraud or misconduct. We encourage the Supplier to have an internal compliance and transparency policy. Any suspected violation of ethical principles must be reported through the designated communication channels in the Transparency and Feedback section.

Conflict of Interest

Supplier must avoid situations in which personal or business interests could influence the objectivity of decisions. In the event of a potential conflict of interest, we request that the Group be promptly informed and jointly consider resolution options.

Fair Competition

Supplier must conduct its activities openly and honestly, adhering to the principles of fair competition and antitrust regulations. Collusion, price manipulation, market allocation and other actions that restrict fair competition are unacceptable.

Anti-Corruption

Supplier conducts its activities honestly and transparently, adhering to applicable laws of the Republic of Kazakhstan and international anti-corruption standards. Any form of bribery, graft or improper inducement, including gifts, cash, services or privileges that could influence the objectivity of decisions when interacting with employees or partners of the Group is unacceptable.

Transparency and Feedback

If any doubts or suspicions arise regarding a violation of the principles of this Code, the Supplier is obligated to promptly notify the Group through available feedback channels or the hotline. Current contact information can be found on the website www.airastana.com and in the Agreement on the Use of the Information System for Electronic Procurement of the Air Astana JSC group of companies (tender.airastana.com). The group of companies guarantees the confidentiality of requests and the protection of bona fide whistleblowers.

4. Human rights and social responsibility

Respect for Rights and Dignity

The Group of Companies adheres to the principles of equality, respect and a safe business environment in its partnerships with suppliers. All business relationships are built on professionalism and exclude bias based on:

- gender,
- age,
- race, nationality,
- language,
- social or property status,
- place of residence,
- religion, beliefs,
- membership in public associations, as well as other characteristics unrelated to professional qualities.

Supplier must support these principles and implement them in its practices. It is important that the Supplier's activities do not tolerate discrimination, modern slavery, psychological pressure, threats, harassment or other forms of unacceptable behavior—both within its own organization and in its interactions with the Group. Such responsible behavior is an integral part of sustainable and mutually respectful cooperation.

Confirmed violations may result in termination of cooperation or other measures stipulated by applicable law and the Group's internal policies, including the Proactive Whistleblowing Policy (available in the e-procurement system).

Combating Modern Slavery

The Group is committed to respecting human rights and expects the Supplier to comply with applicable laws and international standards, including the UK Modern Slavery Act 2015.

Supplier is obligated to prevent all forms of modern slavery including forced labor, human trafficking, child labor and to take measures to assess risks, monitor and eliminate violations in its operations and supply chains.

Supplier must immediately notify the Group if such violations are identified or suspected.

The Group reserves the right to suspend contract performance until any identified non-compliance is resolved.

Occupational Health and Safety

The safety of employees and partners is a priority. Supplier shall ensure safe working conditions, conduct training, provide protective equipment and report on occupational safety incidents.

5. Data, information and intellectual property

Confidentiality and Data Protection

Supplier is responsible for the reliable protection of information and personal data obtained during cooperation with the Group. Data must be used strictly for its intended purpose, access to it must be restricted, upon termination of the cooperation it must be deleted or returned, except in cases required by law.

Supplier must responsibly manage the information and assets entrusted to it during the cooperation. Supplier must comply with confidentiality and security requirements and carefully treat the Group brand and intellectual property taking measures to prevent their loss, damage or unauthorized use.

6. Quality, sustainability and the environment

Product and Service Quality

Products and services supplied to the Group must comply with applicable standards, regulations and technical requirements. A quality control system, reliable information on characteristics and a prompt response in the event of deviations are expected.

Environmental Awareness

The Group attaches great importance to environmental protection and expects the Supplier to conduct its activities in an environmentally responsible manner, including having an internal policy aimed at reducing negative environmental impacts and supporting sustainable development principles.

Under this Code, the Supplier undertakes to:

- comply with applicable environmental regulations and consider environmental impacts at all stages of its operations;
- employ safe technologies, energy-efficient solutions and environmentally sustainable materials;
- strive to reduce emissions, resource consumption and waste;
- prevent pollution and responsibly manage waste and hazardous substances;
- support the conservation of biodiversity and not use prohibited animal products;
- participate in the Group's environmental initiatives and promptly report any violations identified.

We value collaboration with suppliers who share our commitment to environmental stewardship and are confident that our joint efforts will help us achieve sustainable results with a future-proof approach.

7. Monitoring and partner responsibility

Assessment and Engagement

We expect Suppliers responsibly adheres the provisions of this Code. In cases where additional assurance of compliance is required the Group reserves the right to:

- conduct additional checks including audits, inspections and on-site assessments, to jointly analyze the current level of compliance and identify areas for improvement;
- send written notices to eliminate the identified deviations within a reasonable time;
- seek compensation for damages if they were caused by violations;
- request payment of a fine in the prescribed amount if provided for by the terms of the contract;
- use other legally required measures to protect their interests, if necessary.

We are confident that such measures will be perceived as part of constructive engagement and a shared commitment to maintaining high levels of quality, sustainability and trust in our partnerships.

Sanctions Risks and Compliance with Restrictions

Supplier conducts its activities in accordance with applicable laws as well as international requirements regarding sanctions policy and export control. This includes compliance with trade and economic sanctions, embargoes, foreign trade regulations and other restrictions in force in relevant jurisdictions (including Kazakhstan, the European Union, the United Kingdom, the United States, and the United Nations).

Supplier confirms that it and its associated entities are not included and not registered in sanctions lists, do not operate in and not controlled by any jurisdictions subject to comprehensive sanctions.

Supplier is obliged to immediately notify the Group in the event of the introduction of new sanctions or the emergence of circumstances that impede the fulfillment of contractual obligations. The Group reserves the right to suspend contract performance until the situation is clarified and continued cooperation is confirmed.

Compliance with the Provisions of the Code

This Code is considered the foundation for building sustainable partnerships. Violations of provisions may result in corrective measures, revision of contract terms, or restrictions on further interaction, depending on the nature and severity of the situation. We invite all our Suppliers to engage in open dialogue, jointly seek improvements and adhere to common ethical and professional standards within the framework of sustainable and mutually respectful cooperation.

C. FINAL PROVISIONS

8. Confirmation of Agreement

This Supplier Code does not replace the provisions of existing contracts between the Supplier and the Group but rather complements them in terms of ethical compliance, social responsibility and sustainable business practices. Supplier acknowledges its familiarity with this Code and importance in ensuring transparent and responsible interactions and strives to adhere to the stated principles both within its organization and with its third parties.

9. Openness to improvement

Group strives to ensure that the provisions of this Code remain relevant and consistent with changing legal requirements, international standards and the Group's internal priorities.

The Code is reviewed regularly or as needed based on regulatory changes, the emergence of new risks or initiatives in the areas of sustainable development and business ethics.

Suppliers will be informed of significant changes to the Code through the official procurement portal tender.airastana.com or other accessible means. The current version is always available for review on the portal.