APPROVED BY
General Director of
West Dala LLP
K.Sh. Salahadenov
"23" 10 2026

HUMAN RIGHTS, DIVERSITY AND EQUAL OPPORTUNITIES POLICY OF WEST DALA LLP

WD-PLC-08

Atyrau
2026

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The planned revision date for this document is 04.11.2029.

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1. General provisions

1.1. The Policy on Human Rights, Diversity, and Equal Opportunity (hereinafter referred to as the "Policy") defines the principles and priorities of West Dala LLP regarding human rights, diversity, and equal opportunity, and is an open, public document subject to publication on the West Dala LLP's official website for review by all stakeholders, including business partners.

1.2. The Policy has been developed in accordance with the Constitution and legislation of the Republic of Kazakhstan, international norms and standards for the protection of human rights, which are enshrined in the United Nations Universal Declaration of Human Rights of December 10, 1948, the International Covenant on Economic, Social and Cultural Rights of December 16, 1966, and the United Nations Global Compact, among others.

1.3. The goal of the Policy is to respect internationally proclaimed human rights, to ensure equal opportunities, to take into account unique personal characteristics and non-discrimination at all stages of activities of West Dala LLP.

1.4. The Policy is mandatory for all employees of West Dala LLP.

2. Terms and definitions

Business partners - suppliers, contractors, consultants and other persons having business and commercial relations with West Dala LLP;

Discrimination - any restriction or infringement of human rights and freedoms, as well as granting any advantages depending on circumstances unrelated to a person's business qualities, on grounds of origin, social, official and property status, sex, race, nationality, language, attitude to religion, beliefs, place of residence, age or physical disabilities, membership of public associations or other circumstances;

Stakeholder - a person or a group of persons involved to a greater or lesser extent in the activities of West Dala LLP, interested in interacting with West Dala LLP, having influence on West Dala LLP or being influenced by West Dala LLP;

Inclusion - creating an environment where different socio-cultural groups of people and each employee individually are valued, accepted and respected for their unique skills, experiences and perspectives, and where they are given equal opportunities to participate in the progress of West Dala LLP, regardless of any circumstances;

Diversity - specificity of the working environment, oriented towards acceptance of culturally and socially different groups and individuals, as well as adequate and impartial assessment of their specific skills, competencies, development prospects and other characteristics;

Human rights - inalienable rights of every human being, based on the recognition of the inherent dignity of the human person and the freedom and equality of all human beings;

Forced labor - any activity, work or service required of a person under threat of any coercion or penalty and for which that person did not voluntarily offer his or her services;

Equality - the principle of respecting the characteristics and factors that cause differences between employees, abilities and other unique characteristics of employees, and, as a result, providing equal opportunities to employees;

Equal opportunities - an approach that treats all employees equally and is not influenced by discriminatory factors.

3. Basic human rights principles

3.1. West Dala LLP is focused on the fact that all people are free and equal in dignity and rights, regardless of gender, language, age, religion, ethnicity, race, social origin, property status or other attributes and individual characteristics.

3.2. West Dala LLP strives to prevent discrimination and any affront to human dignity, regardless of the grounds or individual characteristics.

3.3. West Dala LLP does not tolerate any form of child labor that is inconsistent with the legislation of the Republic of Kazakhstan.

3.4. West Dala LLP demonstrates zero tolerance for any form of compulsory or forced labor and human trafficking.

3.5. West Dala LLP strives to identify and prevent any adverse human rights impacts as part of its operations by exercising due diligence.

3.6. West Dala LLP respects the rights of all employees, including freedom of expression, the right to associate, and the right to engage in collective bargaining. None of employees of West Dala LLP may be restricted in their labor rights, except in cases and according to the procedure stipulated by the legislation of the Republic of Kazakhstan.
3.7. West Dala LLP strives to ensure that every employee has the right to receive and provide regular feedback.
3.8. West Dala LLP guarantees confidentiality of personal data and other legally protected secrets of clients, employees, business partners and other persons in accordance with the requirements of the legislation of the Republic of Kazakhstan.
3.9. West Dala LLP reserves the right to conduct a social and environmental impact assessment procedure for potential clients and business partners.
3.10. West Dala LLP welcomes business partners to have a clearly articulated corporate position on human rights.
3.11. West Dala LLP does not support any action that promotes, encourages or incites other persons or other organizations to violate or disregard human rights.

4. Basic principles of diversity and equal opportunities

4.1. Ensuring diversity, equal opportunities and inclusion for West Dala LLP employees is an important factor for long-term development and competitiveness of the business. Taking this into account, West Dala LLP is guided by the following basic principles:

1) Equal opportunities.

West Dala LLP provides equal opportunities to all job applicants and employees in accordance with clearly defined and generally accepted rules of employment and labor rationing, taking into account available competencies and within the limits of job descriptions, regardless of individual distinctive characteristics unrelated to business qualities of a person.
This principle applies to all aspects of employment of West Dala LLP employees, including remuneration and working conditions, training, career progression, conduct at work, disciplinary procedures, and termination of employment in accordance with the legislation of the Republic of Kazakhstan and internal documents of West Dala LLP.
Distinctions, exclusions, preferences, or restrictions — whether established by the laws of the Republic of Kazakhstan for specific types of work (such as requirements regarding qualifications, age, health status based on mandatory medical examinations, or authorization to work at hazardous industrial facilities or in environments with harmful and/or dangerous working conditions) or implemented as part of the state's special protection for individuals requiring enhanced social and legal safeguards — do not constitute discrimination.
West Dala LLP does not tolerate any infringement of human dignity, including all forms of harassment and humiliation, as well as any forms of patronage, in particular those based on family ties. All forms of workplace violence, including verbal, physical and psychological violence, are prohibited.

2) Encouraging diversity.

By prioritizing diversity as a competitive advantage, West Dala LLP strives to create a culturally and socially diverse workforce.
West Dala LLP supports the uniqueness of each of its employees and does not discriminate against them in any form.
West Dala LLP respects the diversity of personal values and worldviews and does not prevent employees from openly expressing their views and opinions.
West Dala LLP strives to involve men and women equally in all aspects of operations and management processes, taking into account the specific nature of its business.

3) Decent and comfortable working environment.

West Dala LLP strictly complies with the labor legislation of the Republic of Kazakhstan. Labor conditions created in West Dala LLP comply with the requirements of the legislation of the Republic of Kazakhstan on occupational health and safety, industrial and fire safety, as well as the requirements of the relevant internal documents of West Dala LLP.
West Dala LLP recognizes the right of every employee to a workplace equipped in accordance with occupational health and safety requirements, and to receive information regarding the status of occupational health and safety

conditions. An employee has the right to refuse to perform work (or to suspend work) in the event of a situation that poses a threat to their own life or health, or to the life or health of others, provided that they notify their immediate supervisor or a representative of the employer in the manner established by the legislation of the Republic of Kazakhstan. No retaliatory measures may be taken against an employee who has legitimately exercised this right.

West Dala LLP encourages transparency in labor relations and helps all employees to develop and build their careers by providing support, mentoring and creating conditions for professional growth.

West Dala LLP strives to maintain competitive and decent remuneration levels for its employees, ensuring equal pay for equal work, free from any form of discrimination. The remuneration for members of the governing body, the executive body, and all employees is determined based on objective factors related exclusively to the effectiveness with which job duties are performed.

West Dala LLP provides all employees with social guarantees in accordance with the requirements of the legislation of the Republic of Kazakhstan.

West Dala LLP encourages any initiatives and ideas of employees, the implementation of which may be important for the development of West Dala LLP.

5. Implementation of the principles and approaches of the policy

5.1. West Dala LLP organizes familiarization of employees with the Policy and its principles.

5.2. West Dala LLP carries out internal monitoring and control of compliance of its activities with the principles approved in the Policy.

5.3. West Dala LLP provides customers, employees, business partners and other stakeholders with the opportunity to freely report possible violations of the Policy provisions, guaranteeing confidentiality of communications.

5.4. Complaints about violation of the provisions of the Policy are accepted through the Hotline:

Phone: +7 702 244 18 91

E-mail: hotline@westdala.kz

5.5. Reports regarding violations of the Policy are accepted and reviewed in accordance with the procedure established in WD-PLC-09 "Policy on notification of suspicion of committing violations".

5.6. Decisions concerning confirmed instances of Policy violations are made by the management of West Dala LLP, in accordance with the procedure set forth in clause 3.11 of WD-PLC-09.

5.7. West Dala LLP has zero tolerance for retaliation against employees who report a possible violation of the Policy, even if the concerns are not substantiated, provided that the information was not knowingly false or reported for personal gain.

5.8. Non-compliance with the Policy may become the basis for bringing an employee who violated the Policy to disciplinary responsibility in accordance with the legislation of the Republic of Kazakhstan, as well as internal documents of West Dala LLP.

6. Compliance with the policy

6.1. All employees of West Dala LLP must follow the requirements and principles set out in the Policy, as well as comply with the human rights legislation of the Republic of Kazakhstan.

7. Final provisions

7.1. The Policy comes into effect on the date of approval by the General Director of West Dala LLP.

7.2. The Policy is reviewed as necessary, but at least once every 3 (three) years for its relevance and compliance with applicable norms and standards, and also, without fail, when the requirements of the legislation of the Republic of Kazakhstan affecting the provisions of the Policy change.

7.3. The Policy shall cease to be in effect as of the date a new version of the Policy or an internal document replacing it comes into force, or as of the date a corresponding decision is made by the General Director of West Dala LLP.

7.4. In case of changes in the legislation of the Republic of Kazakhstan and emergence of contradictions between certain provisions of the Policy and the legislation of the Republic of Kazakhstan, such provisions of the

Policy become invalid, and employees of West Dala LLP are guided in their activities by the legislation of the Republic of Kazakhstan until the relevant amendments and additions are made to the Policy.

8. Revision record sheet

Revision	Date of revision	Description of changes made	Title/Full name of the person that made the change
1	20.09.2023	Initial version, in connection with the introduction of ESG	Deputy Head of Human Resources and Industrial Relations A.U. Temirtassova
2	05.10.2026	Changes have been made to clauses 1.1., 3.2., 3.3., 3.6., 4.1. subparagraphs 1), 2), 3)., 7.2., 7.3. Clause 6.2 has been removed.	Deputy Head of Human Resources and Industrial Relations A.U. Temirtassova

9. Acknowledgement sheet

No.	Full Name	Position	Date	Signature