AMERICAN CHAMBER OF COMMERCE IN KAZAKHSTAN

AmCham Kazakhstan Anti-Bribery Policy

approved by Jeff Erlich, Executive Director, November 11, 2026

All AmCham operating policies apply to employees; where applicable, i.e. bribery, they shall be applied to board members, Chamber members and stakeholders. Policies will be updated regularly, with changes highlighted in an appendix.

1 General Provisions

1.1 AmCham is committed to upholding the highest standards of integrity, transparency, and fair competition. AmCham maintains a strict **zero-tolerance policy** toward bribery and corruption in all of its activities.

1.2 As a representative body for the business community, AmCham recognizes its heightened responsibility to set an example of ethical conduct and fair market practices.

1.3 The primary objective of this Anti-Bribery Policy (hereinafter referred to as the "**Policy**") is to establish guidance to prevent, detect, and mitigate bribery and corruption risks in connection with advocacy, lobbying, event organization, membership management, and public policy engagements.

2 Scope of Application

2.1 Compliance with this Policy is mandatory for all members of the Board, Team, Committees, employees, advisors, experts, and third-party agents representing the AmCham (collectively referred to as "**AmCham Representatives**").

2.2 While member companies are independent entities, members are expected to align with the ethical principles set out in this Policy when participating in AmCham activities or representing AmCham.

3 Legal Basis

3.1 The legal basis for the development and implementation of this Policy includes the Constitution of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan "On Combating Corruption", and other regulatory legal acts governing anti-bribery and anti-corruption relations.

4 DEFINITIONS

4.1 **Bribery:** The offering, promising, giving, requesting, soliciting, receiving, or agreeing to receive a Bribe, directly or indirectly, to improperly influence any official, regulatory, or business decision.

4.2 **Bribe:** Any payment, gift, loan, fee, reward, sponsorship, personal favour, or financial/non-financial advantage intended to induce or reward improper performance of a public or official function.

4.3 **Government Official:** Any elected or appointed government official, legislator, judge, civil servant, regulatory authority official, or representative of a state agency or international organization.

4.4 **Advocacy:** Any lawful communication or interaction with Government Officials aimed at influencing legislation, policy, public administration, or regulatory frameworks on behalf of the AmCham or its members.

5 General Prohibitions

5.1 AmCham Representatives are strictly prohibited from:

5.1.1 Offering, promising, authorizing, or giving a Bribe or improper payment to any Government Official, regulator, or private counterparty;

5.1.2 Requesting, soliciting, or accepting any Bribe, kickback, or personal benefit in exchange for advancing specific corporate interests within AmCham;

5.1.3 Using AmCham resources, events, membership dues, or sponsorship funds to facilitate improper payments or confer unauthorized benefits on Government Officials;

5.1.4 Offering employment, advisory roles, or speaking fees to Government Officials in exchange for regulatory or legislative favours

6 Facilitation Payments

6.1 AmCham strictly prohibits making or accepting Facilitation Payments to expedite routine administrative actions.

6.2 Payments made under an immediate threat to physical safety or freedom do not constitute a voluntary violation. Any such payment must be reported to the Compliance Officer immediately once safe to do so.

7 Advocacy and Interactions with Government Officials

7.1 All advocacy and lobbying activities must be transparent, lawful, and conducted strictly in the collective interest of the sector or business community, rather than for the sole improper benefit of an individual member company.

7.2 Providing financial or material incentives to Government Officials involved in legislative drafting, policymaking, or regulatory oversight is strictly prohibited.

8 Events, Gifts, and Hospitality

8.1 AmCham Representatives shall not offer or accept gifts, hospitality, or entertainment that could be perceived as attempting to influence official decisions or create an obligation.

9 Sponsorships, Grants, and Charity Projects

9.1 Sponsorships, educational grants, or charitable initiatives organized or supported by the AmCham must undergo pre-approval to ensure they are not used as covert bribes to influence state authorities or business decision-makers.

10 Political Contributions and Political Neutrality

10.1 AmCham remains strictly non-partisan and politically neutral.

10.2 AmCham shall not make direct or indirect political contributions (monetary or in-kind) to political parties, candidates, or campaign organizations.

11 Transparency of Funding

11.1 Membership dues, sponsorships, and event fees must be collected through official AmCham bank accounts with complete supporting documentation. Cash payments above $100 are prohibited.

11.2 AmCham shall not accept membership dues or donations from entities suspected of illicit activities or money laundering.

11.3 AmCham shall maintain detailed and accurate accounting records reflecting all expenses, sponsorships, event costs, and payments to vendors or consultants.

11.4 Off-the-books accounts, fictitious invoicing, or unrecorded cash transactions are strictly forbidden.

12 Third-Party Due Diligence

12.1 Prior to engaging external consultants, lobbyists, PR agencies, or event organizers, the AmCham shall conduct risk-based due diligence to verify their reputation and compliance standing.

13 Reporting Violations

13.1 Any AmCham Representative or member company representative who becomes aware of a suspected violation of this Policy must report it promptly via:

13.1.1 Executive Director;

13.1.2 Members of the Board of Directors;

13.2 AmCham strictly prohibits any form of retaliation, threat, or disadvantage against anyone who reports a violation in good faith or assists in a compliance investigation.

14 Consequences of non-compliance

14.1 Breaches of this Policy by AmCham employees will lead to disciplinary measures, up to and including termination of employment.

14.2 Breaches involving Board, Team and Committee members may result in immediate expulsion from AmCham, revocation of leadership roles, and reporting to law enforcement where required by law.