

CONFIDENTIALITY AND NON-DISCLOSURE POLICY

This Confidentiality and Non-Disclosure Policy (hereinafter referred to as the "Policy") establishes the requirements of EXPERT SERVICE LLP (hereinafter referred to as the "Company") for the protection of confidential information and defines the obligations of employees, contractors, and other persons who have access to such information.

The purpose of this Policy is to prevent unauthorized access, use, disclosure, and distribution of information, as well as to protect the Company's commercial interests in accordance with the legislation of the Republic of Kazakhstan.

This Policy is mandatory for all Company employees, as well as for third parties who are granted access to information within the framework of contractual relationships.

Key Definitions

Confidential Information — any information, regardless of the form in which it is presented (oral, written, electronic, or other form), access to which is restricted by the Company and the disclosure of which may cause harm to the Company's operations, interests, or reputation.

Confidential Information includes, but is not limited to:

- information regarding customers, partners, and counterparties;
- technical and production documentation;
- results of testing, expert assessments, technical diagnostics, and non-destructive testing (NDT);
- reports, records, protocols, conclusions, and technical documents;
- methodologies, technologies, and software solutions;
- financial and commercial information;
- personal data of employees and customers;
- contracts, commercial proposals, and negotiation terms;
- user accounts, passwords, and access credentials to information systems;
- any other information not intended for public disclosure.

Trade Secret — information that has commercial value due to being unknown to third parties and is protected in accordance with applicable procedures and legislation.

Disclosure — any action or omission resulting in confidential information becoming available to unauthorized third parties without the Company's permission.

Third Parties — any persons who are not authorized by the Company to access confidential information.

Principles of Information Protection

The Company protects confidential information based on the following principles:

- compliance with the legislation of the Republic of Kazakhstan and applicable legal requirements;
- restricted access to information;
- use of information solely for its intended purpose;
- personal responsibility for violations;
- prevention of information leaks and unauthorized access.

Access to confidential information shall be granted only to the extent necessary for the performance of official duties or contractual obligations.

Obligations of Employees and Other Persons

Persons who have access to confidential information shall:

- use such information solely for the performance of their employment or contractual obligations;
- not disclose, transfer, publish, distribute, or otherwise provide confidential information to third parties without the Company's written authorization;
- comply with the Company's internal information protection procedures;
- take measures to prevent information leaks, including proper control over the storage and use of information carriers;
- immediately report any actual or suspected information leakage, unauthorized access, or compromise of confidential information;

- not copy, store, or transfer information beyond what is necessary for legitimate business purposes;
- upon termination of employment or contractual relations, cease using confidential information and, where required, return or destroy information carriers and copies.

Exceptions

Information shall not be considered confidential where it:

- has become publicly available through no fault of the person who received access to it;
- was lawfully obtained from third parties without confidentiality restrictions;
- has been officially disclosed by the Company or disclosed pursuant to a lawful request or decision of authorized governmental authorities.

Information Protection Measures

The Company implements organizational and technical measures to protect confidential information, including:

- restricting access to information;
- monitoring the use of information systems;
- maintaining records of persons authorized to access information;
- protecting electronic data carriers, passwords, and access credentials;
- preventing unauthorized copying, transfer, or distribution of data.

The Company reserves the right to establish additional measures for protecting confidential information, including entering into separate Non-Disclosure Agreements (NDAs) with employees and other persons, as well as additional confidentiality agreements to employment contracts.

Such agreements may include:

- an extended list of confidential information;
- specific conditions for access, storage, and handling of information;
- additional non-disclosure obligations;
- liability for violations of confidentiality requirements.

Such agreements may be concluded where the nature of an employee's duties or the level of access to information requires enhanced protection of Company data.

Employees shall comply with the terms of such agreements in addition to this Policy and other internal Company regulations.

Liability

Persons who violate the requirements of this Policy shall be held responsible in accordance with the legislation of the Republic of Kazakhstan and the Company's internal regulations.

Violations may result in:

- disciplinary action;
- termination of employment;
- recovery of damages caused;
- civil, administrative, or criminal liability.

The Company reserves the right to seek compensation for direct and indirect losses, including lost profits, where applicable.

Effective Date and Final Provisions

This Policy shall enter into force upon approval by the Company's management and shall remain effective indefinitely until amended, replaced, or revoked.

Confidentiality and non-disclosure obligations shall remain in effect after termination of employment or contractual relationships for the period established by the legislation of the Republic of Kazakhstan and the Company's internal regulations.

All amendments and revisions to this Policy shall be approved in accordance with the established procedures.

This Policy is mandatory for review and compliance by all employees and counterparties who have access to confidential information.

Director, EXPERT SERVICE LLP

A.S. Kenzhegaliyev