Transtelecom JSC

www.ttc.kz

THE INTERNET COMES FROM ABOVE

ANNUAL REPORT

2025

Connectivity that needs no roads.

Space got closer.

CONTENT

003 Address by the Chairman of the Board of Directors
004 Address of the Chairman of the Management Board
005 Key events of 2025

1 006 COMPANY TODAY

007 Our History
008 Company Profile
008 Geographic Presence
009 Organisational Structure
009 Mission, vision and values
010 Business Model
011 Strategic goals
011 Development outlook

2 012 FINANCIAL AND ECONOMIC PERFORMANCE

013 Company in figures
013 Key indicators
014 Calculation of the Company's key indicators

3 015 OPERATIONS

016 Company's Services
016 IT outsourcing
017 Retail business development (B2C)
018 Development of carrier business (B2O)
019 Railway business development (B2KTZH)
020 Regional business development (B2R)
020 Intelligent solutions unit development
021 Cloud business and cloud solutions development
021 Satellite communications development
022 Development telecommunications infrastructure along roads
022 AIQYN project: digital modernisation of schools

4 023 SUSTAINABLE DEVELOPMENT

025 HR policy
032 Health and safety
033 Environmental protection
034 Procurement

5 035 CORPORATE GOVERNANCE

036 Corporate governance overview
038 Board of Directors
045 Executive body
045 Values and business ethics
045 Conflict of interest
046 Countering corruption
047 Countering terrorist threats
048 Risk management
051 Internal audit service
052 Information security
052 Quality management

6 053 APPENDICES

054 Appendix 1. About report
057 Appendix 2. GRI content figures
060 Appendix 3. Financial Statements
066 Glossary

ADDRESS BY THE CHAIRMAN OF THE BOARD OF DIRECTORS

IT PROVIDES FOR MORE THAN 500 ANTENNA MASTS AND MOBILE BASE STATIONS

500

Dear Shareholders, Partners and Colleagues,

2025 marked a further stage in the transformation of Transtelecom JSC and strengthened the Company's role as one of the key players in Kazakhstan's digital infrastructure.

A major strategic milestone for the digital transformation of the railway sector came with the Resolution of the Government of the Republic of Kazakhstan of 5 December 2025, which set out ten priority areas for the digitalisation of KTZ National Company JSC. Transtelecom JSC acts as the system supplier and integrator of innovative solutions for these tasks, bringing together the expertise of leading international and industry partners in digital transformation, artificial intelligence and railway technology.

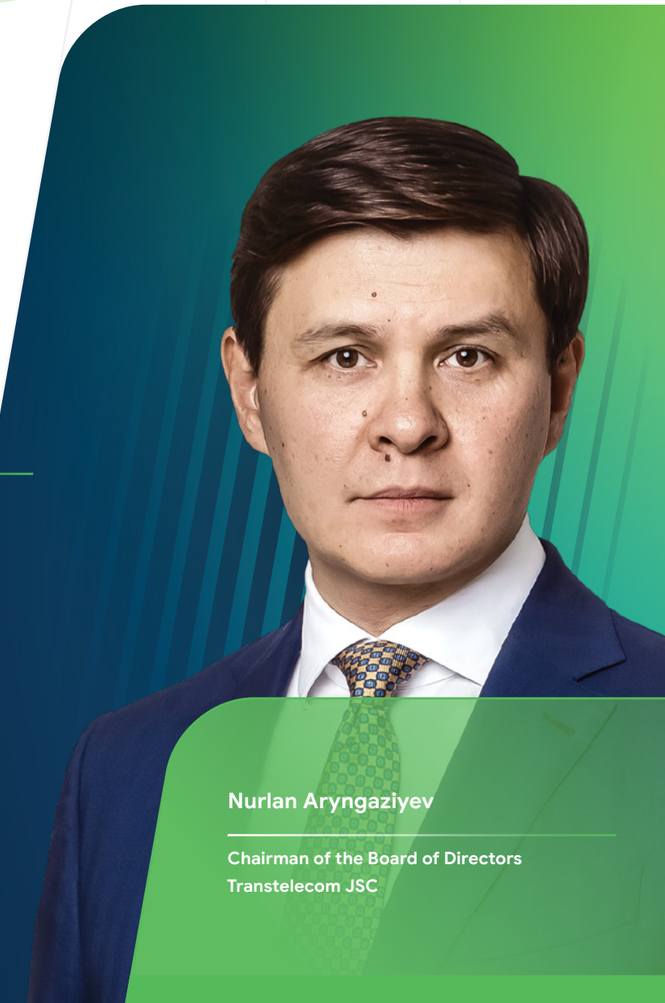
I would also highlight the investment agreement signed between the Ministry of Artificial Intelligence and Digital Development of the Republic of Kazakhstan and Transtelecom JSC to build telecommunications infrastructure along the country's roads. Delivered under the Accessible Internet national project, the initiative aims to close coverage gaps on national and regional highways where mobile service is either absent or unreliable. It provides for more than 500 antenna masts and mobile base stations, which will improve connectivity, road safety and the quality of digital infrastructure on Kazakhstan's highways.

One of the defining events of the year was the Company becoming an official partner of SpaceX, opening up new opportunities to develop Starlink satellite services in Kazakhstan. The Company has built the core infrastructure for localising Starlink traffic, connected a SpaceX ground station and point of presence (PoP), and brought 592 public institutions online.

The Rural Settlements (RS) project remains strategically important. Its goal is to build broadband infrastructure in every rural settlement of 50 or more residents across Kazakhstan by the end of 2027. For the Board of Directors, this project matters not only as an infrastructure initiative but as the Company's contribution to digital accessibility, regional development and closing the digital divide.

On behalf of the Board of Directors, I thank our shareholders for their trust, the Management Board and the Transtelecom JSC team for their professionalism, and our partners and clients for their cooperation. The Company is now entering a new phase of development, focused on scaling up digital services, satellite solutions, cloud infrastructure, artificial intelligence and international transit.

Sincerely,
Nurlan Aryngaziyev
Chairman of the Board of Directors
Transtelecom JSC



Nurlan Aryngaziyev

Chairman of the Board of Directors
Transtelecom JSC

ADDRESS OF THE CHAIRMAN OF THE MANAGEMENT BOARD

AS OF DECEMBER 2025, 471 RURAL SETTLEMENTS HAD INTERNET ACCESS

471

Dear Shareholders, Partners and Colleagues,

For Transtelecom JSC, 2025 was a year of tangible results, technological progress and groundwork for the next stage of growth. We continued to strengthen the Company's position in telecommunications, digitalisation, systems integration, cloud services, satellite communications and solutions for the railway industry.

In 2025 we carried out preparatory work on a modern LTE-R digital network, which is set to become one of the foundations of the digital transformation of Kazakhstan's railway sector. To be implemented under the Government Resolution, the project will create a single digital platform for managing transport operations, infrastructure and rolling stock, with digital coverage along more than 20,000 km of railway lines and around 2,800 LTE-R radio sites.

As part of the Investment Agreement project, we also laid the groundwork for closing coverage gaps on Kazakhstan's highways. We analysed the baseline data, identified priority road sections and sites for communications infrastructure, set up coordination with government agencies and worked through the technical solutions.

For KTZ NC JSC, we continued to develop integrated telecommunications and IT solutions. We built AI services for KTZ corporate and operational users and delivered several initiatives, including an AI assistant for analysing regulatory documents, a system for detecting hidden transit, and the AI Recruiting project. Work also continued on SD-WAN, E-Telegram, automated systems and operational communications. Together, these solutions improve process efficiency, data transparency and the quality of management.

Satellite communication development was among our key achievements of 2025. Transtelecom JSC became an official SpaceX partner, enabling us to deploy Starlink solutions across Kazakhstan. In 2025 we connected more than 300 rural settlements to the internet, the Unified Internet Access Gateway (UIAG) and the Unified Transport Environment of State Bodies (UTE SB), and provided satellite internet to Kazpost JSC, Kazakhtelecom JSC, PetroRetail LLP and over 100 other companies.

Building digital infrastructure in rural areas remains a priority for us. Under a public-private partnership and the Digital Kazakhstan programme, Transtelecom JSC operates a 5,600 km network, and as of December 2025, 471 rural settlements had internet access.

I thank the employees of Transtelecom JSC for their professionalism, sense of responsibility and readiness to take on complex challenges. I am also grateful to our shareholders, the Board of Directors, and our clients and partners for their trust and support.

Sincerely,
Suyenish Abdildin
Chairman of the Management Board
Transtelecom JSC



Suyenish Abdildin

Chairman of the Management Board
Transtelecom JSC

KEY EVENTS OF 2025

Transtelecom JSC became an official partner of SpaceX, enabling it to deploy Starlink satellite solutions in Kazakhstan.

The TTC TV mobile app was updated for Android and iOS smartphones and Smart TV, and the Qazaqsha and Qazaqfilm online cinemas were added.

A pilot project for FMC B2C (Fixed Mobile Convergence) mobile services was launched.

Development continued on AI services for the corporate and operational users of KTZ NC JSC.

Transtelecom and Talap signed a memorandum of cooperation. Under the partnership, TTC sponsored WorldSkills Kazakhstan and provided the championship with high-speed internet.

The Kokshetau branch (KokshetauTTC) launched TTC's first GPON connection in Petropavl.

Transtelecom JSC took part in Turkmentel 2025 in Ashgabat. Company representatives held an official meeting with Hajimyrat Hudaygulyyev, Minister of Communications of Turkmenistan, and Annadurdy Annadurdyyev, Deputy Director General of the state telecommunications company Turkmentelecom.

Transtelecom JSC held TTC AI Day at Astana IT University.

Transtelecom completed the installation of 14 modern bus shelters in Pavlodar.

TTC delivered high-speed internet access to popular recreation areas on the scenic Lake Shalkar, supporting the development and modernisation of tourist destinations in line with the objective set by the Head of State.

TTC's cloud solutions and data centres in Astana and Almaty passed their regular audit, confirming compliance with the international PCI DSS v4.0.1 security standard.

Transtelecom JSC

1 COMPANY TODAY

TRANSTELECOM JSC BECAME AN OFFICIAL SPACEX PARTNER, ENABLING US TO DEPLOY STARLINK SOLUTIONS ACROSS KAZAKHSTAN



007 Our History
008 Company Profile
008 Geographic Presence
009 Organisational Structure
009 Mission, vision and values
010 Business Model
011 Strategic goals
011 Development outlook

OUR HISTORY

1998 – 2004

The Company was established as a spin-off from KTZ. Telecom operations began with the launch of internet services, the installation of digital telephone exchanges and interconnection with the Kazakhtelecom JSC network.

2005 – 2009

Infrastructure expansion: the Almaty–Astana fibre-optic line (1,340 km), a Network Operations Centre and international channels, starting with Astana–London. The Company took part in international exhibitions and introduced automated systems.

2010 – 2014

New services: on-train internet, connection of KTZ branches, and the development of satellite and telegraph communications. The fibre-optic network reached 8,139 km, and digital solutions were launched for the railway and healthcare sectors.

2015 – 2017

Privatisation. The Company began its transformation and adopted a lean approach. A 100G DWDM optical network was deployed, TTC became the digital solutions integrator for the KTZ Group, and a Security Operations Centre (SOC) was set up. The fibre-optic network exceeded 15,000 km.

2018 – 2019

Rebranding to the TTC trademark and the launch of the 191 contact centre. Growth in cloud solutions, data centres, blockchain initiatives and cybersecurity. A large-scale project connected rural schools to the internet in nine regions.

2020 – 2021

429 villages were connected to fibre-optic internet and seven regional data centres were built. A stake of 75% minus one share was transferred to Unit Telecom LLP. The Company expanded its international partnerships and TCFO projects.

2022

A year of active innovation: memoranda with 20 universities, start-up initiatives with Plug and Play, a new 100 Gbps CGNAT platform, modernised telegraph infrastructure, the launch of the TTC TV app and Tier III certification for the data centre.

2023

More channels and interconnection points with China, Russia and Uzbekistan. Digital projects delivered in education and for KTZ. Launch of the Public Cloud platform. TTC ranked No. 1 among telecom companies for employer brand (The Talentist).

2024

Work began on new digital products using artificial intelligence (AI) and big data analytics.

2025

Transtelecom JSC became an official SpaceX partner.

The Government of the Republic of Kazakhstan adopted the Resolution of 5 December 2025 setting out priority areas for the digitalisation of KTZ NC JSC, with Transtelecom JSC acting as the system supplier and integrator of innovative solutions for these tasks.

The Ministry of Artificial Intelligence and Digital Development of the Republic of Kazakhstan and Transtelecom JSC signed an investment agreement to develop telecommunications infrastructure along the country's roads.

Transtelecom JSC presented AIQYN, a project aimed at the comprehensive modernisation of school IT infrastructure.

COMPANY PROFILE

Transtelecom Joint Stock Company (hereinafter referred to as Transtelecom JSC or the Company) is one of Kazakhstan's largest telecommunications operators. The Company specialises in telecommunications, digitalisation and systems integration across IT, communications, automation and energy.

Legal status

The Company was established in 1998 as a subsidiary of Kazakhstan Temir Zholy National Company JSC (hereinafter KTZ). In 1999 it was reorganised into a joint stock company wholly owned by the state. It is the legal successor to all rights and obligations of its predecessor and operates under a Charter approved in 2020.

Core services

International, long-distance and local communications.

Internet access.

Backbone communication channels.

Infocommunication, digital and cloud services.

Head office address

Republic of Kazakhstan, Astana, Yessil District, 10 Dinmukhamed Kunayev Street, Z05H9A7.

Objectives

- Providing advanced digital solutions in Kazakhstan and beyond.
- Developing and integrating modern information and telecommunications networks.
- Generating profit and protecting shareholders' interests.

GEOGRAPHIC PRESENCE

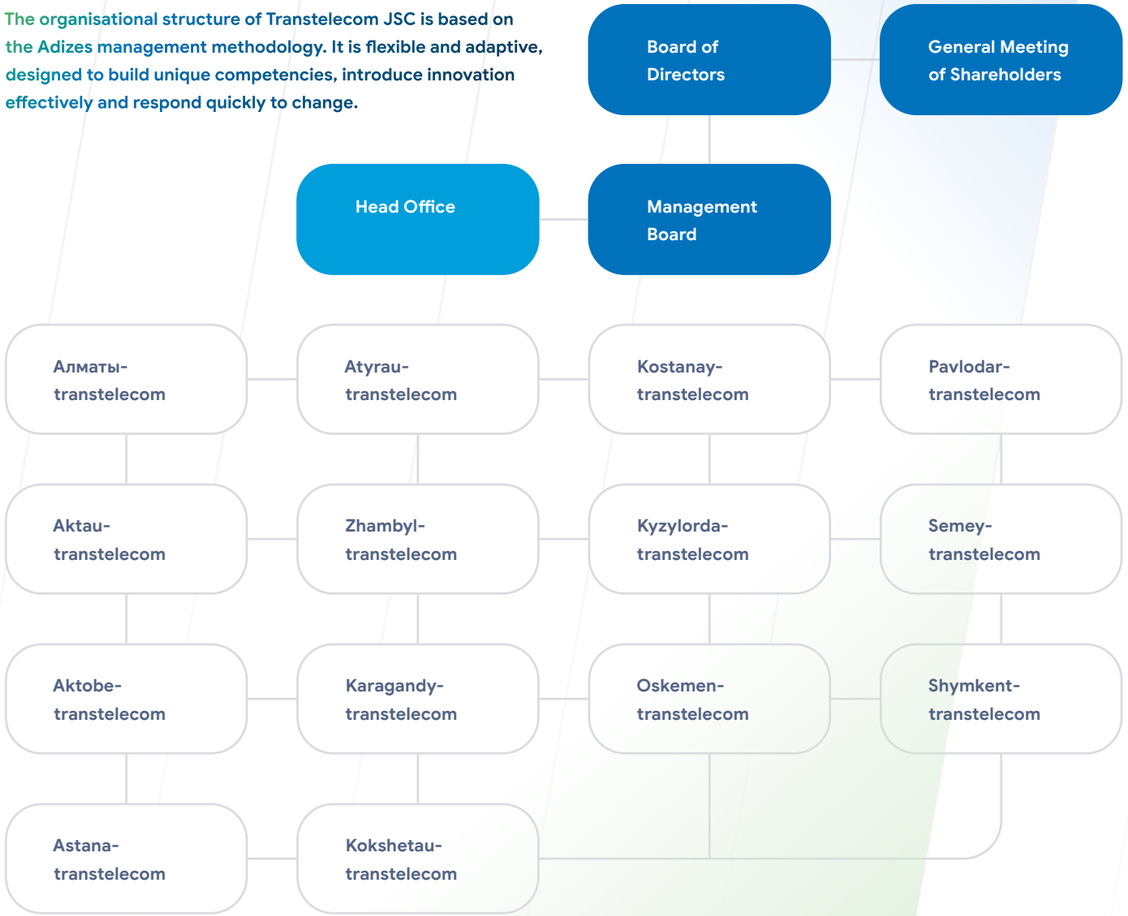
Transtelecom JSC is one of Kazakhstan's largest telecom operators, with an extensive network of 14 branches across the country.

Network and coverage

- 14 branches across the country.
- 2 data centres.
- An extensive fibre-optic network linking Kazakhstan with operators in Russia, China, Kyrgyzstan, Uzbekistan and, in future, Turkmenistan.

ORGANISATIONAL STRUCTURE

The organisational structure of Transtelecom JSC is based on the Adizes management methodology. It is flexible and adaptive, designed to build unique competencies, introduce innovation effectively and respond quickly to change.



MISSION, VISION AND VALUES

Mission

To lead the people of Kazakhstan to digital prosperity by drawing on the Company's unique capabilities.

Vision

Transtelecom JSC aims to be a diversified provider of a broad range of ICT services, delivering large-scale integrated projects in the private and public sectors and serving both individuals and organisations.

The key elements of this vision are:

- Serving every segment of the market.
- Combining service provision with project delivery.
- Offering a large portfolio that brings together traditional telecom services with IT and cloud services.

Values

RESPECT

We respect one another. We treat clients, partners and competitors as equals and accept that they have their own values and goals. We listen to them and hear what they say, look for common ground and build mutually beneficial relationships, provided this does not conflict with the values of Transtelecom JSC.

IMPROVEMENT

We never stop improving.
Transtelecom JSC works continuously on the quality and convenience of its services for clients, and on improving its own operations: staff skills and engagement, the efficiency of business processes and procedures, and its organisational structure.

RELIABILITY AND REPUTATION

We are a reliable company and we value our good name.
Transtelecom JSC works to maintain and build its reputation as a dependable service provider and partner, and as a socially responsible, law-abiding market player.

BUSINESS MODEL

The current TTC business model, set out in the Business Model Canvas format

KEY PARTNERS
- Developing a partnership-based business model (bringing in partners while retaining strategic control of the business)

KEY ACTIVITIES
- Acquiring new clients
- Taking part in tenders
- Contributing to the development of regulations

KEY RESOURCES
- Human resources
- Technical infrastructure

VALUE PROPOSITIONS
- Cloud services
- International transit and internet services

CUSTOMER RELATIONSHIP
- A focus on maintaining long-term client relationships

CHANNELS
- Own fibre-optic network
- Data centres

CUSTOMER SEGMENTS
- B2KTZH
- B2BG
- B2O
- B2SP
- B2R
- B2C
- B2Cloud

COST STRUCTURE
- Contracting third parties to carry out work and provide services
- Capital expenditure (equipment purchases)
- Infrastructure operation

REVENUE STREAMS
- Revenue-generating contracts for work and services

STRATEGIC GOALS

Transtelecom JSC has set itself the following strategic goals:

① **Net profit growth** through process optimisation and the introduction of new services.

② **Greater operational efficiency** through modern technology and process automation.

③ **A broader client base:** acquiring new clients in every segment, reducing dependence on any single major client and increasing the share of service revenue.

④ **A wider product portfolio:** introducing new services and solutions tailored to current and future market needs.

DEVELOPMENT OUTLOOK

To maintain and strengthen its market position, Transtelecom JSC is pursuing several strategic priorities.

DEVELOPING THE B2KTZH BUSINESS:
- Building a digital ecosystem for the railway sector through new projects: LTE-R, SIRDP (interval train control), Smart Locomotive and Depot, Smart Station, Smart Infrastructure, UDMP, AMS CCO, AI, AMS EDTC 2.0 and data centres.

DEVELOPING THE B2RG SEGMENT:
- Scaling up projects already delivered in the regions.
- Advancing the Rural Settlements (RS) project (which will provide broadband infrastructure in every village of 50 or more residents across Kazakhstan by the end of 2027).
- Advancing the smart meters project for housing and utilities.
- Advancing the project to provide telecommunications infrastructure for the water canals of the Ministry of Water Resources and Irrigation.
- Expanding the market with Starlink global satellite internet.
- Key growth drivers: video surveillance systems, AI solutions and telecom services.

B2O SEGMENT:
- Connecting operators in the regions.
- Developing international routes.
- Increasing network capacity.
- Improving network resilience.

FOCUS ON THE B2B SEGMENT:
- Delivering major regional business projects (with a focus on oil and gas, subsoil users, mining and banking).
- Setting up a centre of competence for SAP, SCADA and AI.
- Building network infrastructure solutions: Private LTE, Wi-Fi, Starlink, SOC and SORM (lawful interception).

EXPANDING IN B2C SEGMENT:
- Growing connections to internet and OTT TV services.
- Improving service quality and customer support, with a target customer satisfaction index (CSI) of 4.5.

INNOVATIVE SERVICES AND SOLUTIONS:
- Moving AI from pilots to full deployment and roll-out across TTC, KTZ, the Financial Monitoring Agency and other organisations.
- Developing a foundation AI model for the railway sector.
- Scaling railway AI solutions internationally.
- Building data centres for TTC and the wider market.
- Establishing a mobile operator based on TTC.

Transtelecom JSC continues its transformation into a national digital provider offering flexible, high-tech solutions for business, government and society.

Transtelecom JSC

2 FINANCIAL AND ECONOMIC PERFORMANCE

IN 2025, TRANSTELECOM JSC DELIVERED STABLE FINANCIAL RESULTS AND MAINTAINE ITS OPERATIONAL EFFICIENCY



013 Company in figures
013 Key indicators
014 Calculation of the Company's key indicators

COMPANY IN FIGURES

22%
EBITDA MARGIN

-185
MLN KZT
NET LOSS

19,107
MLN KZT
EBITDA

47,762
MLN KZT
EQUITY

88,140
MLN KZT
INCOME

74,046
MLN KZT
COST OF SALES

87,971
MLN KZT
REVENUE

7,177
MLN KZT
GENERAL ADMINISTRATIVE EXPENSES

KEY INDICATORS

	Value	2021	2022	2023	2024	2025
Financial indicators						
Operating income	million KZT	84,615	81,663	78,934	88,968	**88,140**
Net profit	million KZT	4,823	(11,129)	10,719	18,345	**(185)**
EBITDA	million KZT	35,295	20,643	18,597	22,039	**19,107**
EBITDA margin	%	42%	25%	24%	25%	**22%**
ROACE	%	13%	7%	6%	9%	**8%**
Cost of sales	million KZT	58,429	67,344	67,707	69,436	**74,046**
General administrative expenses	million KZT	7,341	8,018	6,492	11,044	**7,177**
Capital expenditure	million KZT	22,172	11,111	20,057	37,409	**21,930**
Performance indicators						
ROIC (return on invested capital)	%	12%	10%	5%	7%	**6%**
Total assets	million KZT	198,690	220,037	190,161	124,297	**124,057**
Liabilities	million KZT	162,824	195,271	154,592	70,507	**76,295**
Equity	million KZT	35,866	24,767	35,568	53,790	**47,762**

CALCULATION OF THE COMPANY'S KEY INDICATORS

	31.12.2021	31.12.2022	31.12.2023	31.12.2024	31.12.2025
Liquidity					
Absolute liquidity ratio	0.14	0.11	0.06	0.48	**0.16**
Quick ratio	0.77	0.37	0.33	1.7	**1.20**
Current ratio	0.82	0.41	0.39	1.77	**1.26**
Profitability					
Return on assets (ROA)	2.4%	-5.1%	5.6%	14.8%	**-0.1%**
Return on equity (ROE)	13.4%	-44.9%	30.1%	34.1	**-0.4%**
Return on sales (ROS)	5.7%	-13.6%	13.6%	20.7%	**-0.2%**
Net profit, thous. KZT	4,823,149	-11,128,752	10,719,155	18,345,078	**-185,492**
Capital					
Total capital, thous. KZT	35,866,067	24,766,655	35,568,860	53,789,768	**47,762,144**
Capital adequacy ratio	0.18	0.11	0.19	0.43	**0.39**
Debt burden					
Long-term loans and borrowings, thous. KZT	48,185,799	17,559,725	22,286,506	31,467,090	**30,967,102**
Short-term loans and borrowings, thous. KZT	10,571,068	44,570,449	2,157,832	805,336	**3,882,894**
Debt / revenue	0.70	0.76	0.31	0.36	**0.40**
Debt / EBITDA	1.66	3.01	1.31	1.46	**1.82**
Debt / equity	1.64	2.51	0.69	0.60	**0.73**

In 2025, Transtelecom JSC delivered stable financial results and maintained its operational efficiency. Revenue from services amounted to KZT 88,140 million and EBITDA to KZT 19,107 million, giving an EBITDA margin of 22%, which reflects the Company's operating profitability. Return on average capital employed (ROACE) was 8%, showing how effectively capital is used in operations.

Cost of sales was KZT 74,046 million, and general administrative expenses were KZT 7,177 million. The Company ended the reporting year with a net loss of KZT 185 million. Debt metrics nonetheless remain at acceptable levels: debt to revenue stood at 0.40, debt to EBITDA at 1.82 and debt to equity at 0.73, pointing to a balanced capital structure and a controlled level of debt.

According to the audited financial statements, Transtelecom JSC reported a net profit of KZT 1,406,314 thousand for 2025, while the Group recorded a net loss of KZT 185,492 thousand. The difference is mainly due to two factors:

- When Railverse LLP was acquired, its assets and liabilities were measured at fair value and then consolidated in accordance with IFRS. As a result, the Group recognised KZT 1,269,454 thousand of depreciation and amortisation on the subsidiary's property, plant and equipment and intangible assets for 2025. These charges significantly increased the Group's cost of sales and therefore reduced its financial result.
- Railverse LLP recorded a net loss of KZT 335,677 thousand for 2025, which also weighed on the Group's consolidated result.

Transtelecom JSC

3 OPERATIONS

TRANSTELECOM JSC PROVIDES A WIDE RANGE OF TELECOMMUNICATIONS AND IT SERVICES ACROSS KAZAKHSTAN



016 Company's Services
016 IT outsourcing
017 Retail business development (B2C)
018 Development of carrier business (B2O)
019 Railway business development (B2KTZH)
020 Regional business development (B2R)
020 Intelligent solutions unit development
021 Cloud business and cloud solutions development
021 Satellite communications development
022 Development telecommunications infrastructure along roads
022 AIQYN project: digital modernisation of schools

COMPANY'S SERVICES

Transtelecom JSC provides a wide range of telecommunications and IT services across Kazakhstan.

CUSTOMER SERVICES

- **Contact centre –** handling enquiries by phone and through WhatsApp, Telegram chat on the client's behalf.
- **Interactive TB (TTC TV) –** a scalable platform supporting OTT, CDN, and mobile and Smart TV apps.

CLOUD AND DIGITAL SOLUTIONS

- **IaaS –** creation of a virtual data centre with server and network management.
- **Electronic archive –** storage and retrieval of digital documents.
- **Data centre colocation –** leasing of server space with power and connectivity.
- **Video conferencing –** set-up and technical support.
- **Distance learning (DLTS) –** turnkey deployment of learning platforms, including software and hardware.

IT INFRASTRUCTURE AND SUPPORT

- **Service-desk –** technical support for users.
- **ITSM platform –** IT process management.
- **Workplace outsourcing –** maintenance of computers, software and peripherals.
- **Network support –** configuration and maintenance of network equipment.
- **IT infrastructure support –** servers, storage systems, UPS units and air conditioning.

INFORMATION SECURITY

- **ISMS –** corporate data protection and security management.
- **Information security consulting –** maturity audits, development planning and threat response.
- **SORM –** connecting clients and operators to the SORM lawful interception system.

SYSTEM SOLUTIONS AND PROJECTS

- **SAP –** implementation and support of SAP ERP, HCM, BW, BO, CRM, HANA, S/4 HANA.
- **Project delivery –** managing the rollout of new services and solutions of any complexity.

TELECOMMUNICATIONS SERVICES

- **Long-distance and international calls –** telephony between regions and countries.
- **SIP telephony –** voice transmission over IP networks.
- **SIP trunking –** digital telephony with as many numbers as the client needs.
- **Telegraph –** transmission of documented messages with legal force.
- **IPTV/OTT –** television.
- **FMC B2C –** mobile services.

INTERNET ACCESS

- **ADSL –** internet over a telephone line, alongside voice service.
- **FTTB/FTTX/GPON –** fibre to the building or apartment.
- **Ethernet –** high-speed internet at up to 100 Gbps.

CORPORATE CONNECTIVITY

- **VPN/IP/MPLS –** secure networks linking branches and partners in Kazakhstan and abroad.
- **Point-to-point digital channels –** data transfer between offices.
- **Satellite channels –** satellite-based connectivity for remote areas.
- **Operator interconnection –** connecting third-party networks to TTC infrastructure.

INTERNATIONAL CONNECTIVITY

- **International transit –** traffic carried over the fibre-optic backbone (more than 24,000 km long).
- **Peering –** BGP-based exchange of traffic and routes between operators.

IT OUTSOURCING

Transtelecom JSC is developing its IT outsourcing business, which covers designing, operating and supporting IT systems for other organisations.

The Company offers the full service cycle, from implementation and development to ongoing support of ICT infrastructure. Having a single operator handle all of these tasks delivers high quality, stability and cost-effectiveness, particularly for large clients.

RETAIL BUSINESS DEVELOPMENT (B2C)

Leading telecom companies worldwide treat the B2C segment as a priority.
For Transtelecom, retail remains one of the key growth drivers and a source of stable recurring revenue.
In 2025, segment revenue grew by 19% compared with 2024, and the number of contracts signed through the partner network rose by 26%.

In 2025, the Company ran the FMC B2C (Fixed Mobile Convergence) pilot project, which launched on 1 May 2025. The project offers a converged product that combines Transtelecom JSC's fixed services with mobile services from MT-S, under a single monthly fee for the whole package.

The main objectives of the project are:

- growing the customer base through a bundled offer;
- expanding Transtelecom JSC's product line;
- strengthening the Company's competitive position in the telecom market with converged solutions that reflect best local and international practice.

Since the launch, the B2C segment has shown positive momentum, with a growing number of subscribers taking mobile services as part of the converged product.

To develop the OTT TV service, the Company updated the TTC TV mobile app in 2025 for Android and iOS devices and Smart TV platforms. The content offering was also expanded with the Qazaqsha and Qazaqfilm online cinemas, giving viewers access to exclusive films and entertainment.

As part of its retail development in 2025, the Company also streamlined and transformed a number of business processes to make its dealings with telecom customers more effective. In particular:

- processes for working with partners (dealers, investors and property developers) were standardised;
- service quality and customer care are assessed regularly through site visits, phone calls and subscriber surveys;
- the public contract for telecom services to individuals was standardised, and some of its provisions were updated.

REVENUE GROWTH, 2025 VS 2024:

- **+19% –** B2C segment revenue
- **+20% –** internet access revenue
- **+10% –** OTT revenuец

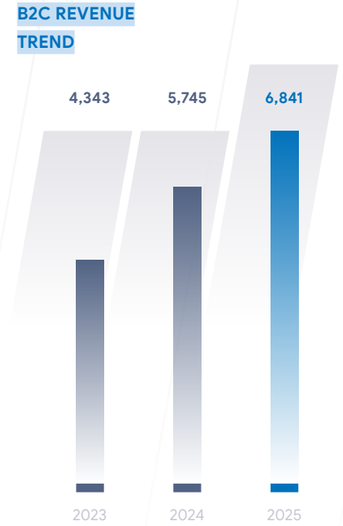
B2C segment revenue for 2025 totalled KZT 6,841 million.

PARTNER GROWTH:

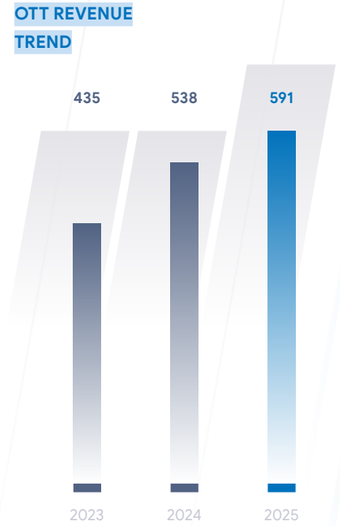
- **+29% –** revenue growth;
- **+11% –** growth in the active subscriber base.

Growth in B2C contracts signed through partners was +26%.

B2C REVENUE TREND



OTT REVENUE TREND



DEVELOPMENT OF CARRIER BUSINESS (B2O)

Transtelecom JSC continues to build its international carrier business, providing telecom services to partners both in Kazakhstan and abroad. The Company works with leading international operators, supplying reliable infrastructure for data transmission, traffic transit and interconnection with networks at various levels.

The aim of this business line is to provide modern technological solutions that support clients' growth and meet the demands of the global digital market.

International Presence and Transit Business Development

In 2025, Transtelecom JSC continued to strengthen its position in the international telecom market, expanding cooperation with leading operators in China, Central Asia, Europe and Russia.

A key infrastructure advantage of the Company is that the points of presence (PoPs) of China's three largest operators are hosted in Transtelecom's Almaty data centre. The Company also has its own PoP in Hong Kong, which supports international channels between Asia and Europe.

During the reporting period, Transtelecom JSC expanded its cooperation with Starlink, providing international transport infrastructure and connectivity for the client's network sites in Kazakhstan and on international routes. The Company also continued its strategic partnership with British Telecom Global Services Ltd., which has installed its own PoP at Transtelecom's Almaty site.

These projects reinforce Transtelecom's position as a regional telecom hub and build up its international transit capability.

Participation in International Forums and Conferences

MOBILE WORLD CONGRESS SHANGHAI 2025 (SHANGHAI, CHINA)
Talks were held with China Telecom Global, China Mobile International and China Unicom on developing international traffic and joint projects.

IWTC 2025 (TASHKENT, UZBEKISTAN)
The Company met Uzbektelecom JSC and operators from Kyrgyzstan and Russia to discuss partnerships and new services.

TURKMENTEL 2025 (ASHGABAT, TURKMENISTAN)
Agreements were reached on developing network interconnection between Kazakhstan and Turkmenistan.

Domestic Market

- Internet channel and VPN projects were delivered in various regions of the country.
- Connection of the mobile operators Kcell JSC, Tele2 and Beeline was completed at Almaty metro stations, improving mobile service quality and increasing network capacity.

RAILWAY BUSINESS DEVELOPMENT (B2KTZH)

The B2KTZH segment focuses on building a single digital platform for KTZ NC JSC, using the latest technologies, integrated solutions and a tailored approach.

On 5 December 2025, the Government of the Republic of Kazakhstan adopted Resolution No. 1055/ktp/dsp (hereinafter referred to as the Government Resolution), setting out ten priority areas for the digitalisation of KTZ NC JSC. These areas are interconnected and together form a single framework for the company's digital transformation. As the system supplier and integrator of innovative solutions for KTZ, Transtelecom JSC is delivering projects under the Resolution that improve the efficiency, safety and competitiveness of rail transport. To bring in advanced technology, the Company works with leading international and industry organisations with proven expertise in digital transformation, artificial intelligence and railway technology.

CORE B2KTZH COMPETENCIES:

- Telecommunications and fibre-optic networks.
- ASU EDT and operational railway communications (OTS).
- Support for KTZ NC JSC equipment.
- Information security (ISMS).
- LAN and Wi-Fi modernisation.

B2KTZH AREAS OF ACTIVITY:

- Automation and remote control.
- Communications and radio communications.
- Security and power systems.
- Information systems.

ACHIEVEMENTS IN 2025:

- Development of AI services for KTZ NC JSC corporate and operational users.

Transit and Carrier Business

Transtelecom JSC is KTZNC JSC key digital partner and is actively introducing advanced telecom and IT solutions into railway infrastructure.

OTC AND SD-WAN

- Operational technologic communications (OTC) were set up at the Regional Train Traffic Control Centre in Almaty.
- A leased-channel service with an upgraded data network (SD-WAN) was introduced, giving access to business-critical systems, reducing costs and enabling centralised monitoring.

AMS EDTC

- For more than ten years, TTC has been rolling out the Traction Energy Dispatch automated control system on locomotives, which tracks fuel, routes, operating modes and drivers' hours.

E-TELEGRAM

- The E-Telegram system was launched, a digital platform for processing and managing telegrams across the whole KTZ NC JSC group.
- Pilots and trial operation have been completed, and the system is ready to move into full production use.

LOCALISING INTERLOCKING AND AUTOMATIC BLOCK SIGNALLING

- Preparations are under way to modernise outdated train control systems and gradually localise their production.
- Capacity is expected to rise and costs to fall through manufacturing in Kazakhstan.

WI-FI UPGRADE AT KTZ NC JSC HEAD OFFICE

This was the first deployment in Kazakhstan of Wi-Fi 6 (802.11ax) with the WPA3 security protocol. WPA3 uses new approaches to provide more reliable authentication and stronger cryptography, which has substantially raised the level of protection.

- A wireless network for 6,000 users was created, with wider coverage and stronger security.

Outlook for 2026

The B2KTZH segment focuses on creating and deploying integrated digital and telecom solutions for the railway sector. Following the instructions of the Government of the Republic of Kazakhstan and as part of KTZ NC JSC digital transformation programme, the Company plans a series of projects to improve the safety, efficiency and capacity of the rail network.

The key priorities are building the LTE-R digital radio network, digitalising locomotives, stations and infrastructure facilities, introducing modern train control systems, creating a single monitoring centre for transport operations, and applying artificial intelligence to make operations safer and more efficient.

REGIONAL BUSINESS DEVELOPMENT (B2R)

B2R made a significant contribution to Transtelecom JSC overall financial results, strengthening the Company's position in the regions and confirming the effectiveness of its regional business model.

Rural Connectivity and NIT JSC Project Development

CONNECTING VILLAGES TO THE INTERNET (SNP)

Under a public-private partnership and the state Digital Kazakhstan programme, Transtelecom JSC operates a 5,600 km network together with SilkNetCom LLP. As of December 2025, 471 rural settlements had internet access.

NIT JSC PROJECT

NIT JSC remains a strategic partner of the Company.
In 2025: the number of IP VPN connection points was increased.

SECURITY AND IT INFRASTRUCTURE

- Video surveillance and access control systems in schools and at critical information infrastructure facilities.
- Maintenance of fire and security alarm systems.
- Fibre-optic construction and lighting installation.
- Video conferencing, IT infrastructure services and help desk.
- Office equipment maintenance and managed print services.
- Design work and fibre-optic line relocation.
- GPS monitoring of school and corporate vehicles.
- Modular rescue buildings.

/ E-ATTENDANT PROJECT
/ AIKYN EDUCATION PROJECT IN SHYMKENT
/ VIDEO SURVEILLANCE FOR THE MANGYSTAU REGION POLICE DEPARTMENT
/ MODULAR RESCUE STATIONS ON LAKES IMANTAU AND SHALKAR
/ SMART BUS STOPS IN PAVLODAR
/ FIBRE-OPTIC CONSTRUCTION FOR THE ATYRAU REGION POLICE DEPARTMENT

INTELLIGENT SOLUTIONS UNIT DEVELOPMENT

Throughout 2025, the Intelligent Solutions unit worked on developing AI-based solutions for KTZ NC JSC. The aim was to introduce modern digital tools that improve the efficiency of business processes, automate information handling and support management decision-making.

THE FOLLOWING INITIATIVES WERE DELIVERED DURING THE REPORTING PERIOD.

1. **AI assistant for searching and analysing KTZ NC JSC regulatory documents.**

A digital assistant was developed to provide intelligent search and analysis of the company's regulatory documentation. It quickly locates the information users need, generates answers based on internal regulations and cuts the time staff spend searching for and processing information.

2. **Hidden transit analysis system.**

This solution identifies and analyses possible hidden transit by processing and cross-referencing transport operations data. It makes shipments more transparent and gives analysts the tools to spot potential irregularities and act on them.

The project has since moved forward in practice. A contract was signed in 2026, under which the system's functionality is currently being extended and developed further.

3. **AI Recruiting Project.**

An AI-based solution was developed to automate recruitment. It analyses candidates' CVs, matches their skills against job requirements and generates recommendations for recruiters, improving both the quality and the speed of the hiring process.

Overall, in 2025 the Intelligent Solutions unit produced a number of promising AI initiatives for KTZ NC JSC. The results confirmed the potential of artificial intelligence for the Company's practical tasks and laid the groundwork for developing and scaling these digital solutions further.

Work on intelligent systems will continue as part of KTZ NC JSC digital transformation agenda.

CLOUD BUSINESS AND CLOUD SOLUTIONS DEVELOPMENT

The main B2Cloud services are infrastructure as a service (IaaS) and colocation.

IaaS gives clients virtual computing resources, storage systems and network services that can be scaled flexibly.

Colocation covers the housing of clients' server and telecom equipment in a data centre with uninterruptible power, climate control, physical security and high-speed connectivity.

Plans for 2026 include building the Cloud+AI platform, which will bring cloud infrastructure and artificial intelligence services together in a single ecosystem. It will give clients access to computing resources, machine learning tools, generative AI, data processing and analytics on an "as a Service" basis. The aim is to widen the portfolio of digital services, strengthen the Company's competitive position and create new revenue streams from AI-based solutions.

SATELLITE COMMUNICATIONS DEVELOPMENT

In 2025, Transtelecom JSC significantly strengthened its position in satellite telecommunications.

The Company became an official Starlink partner, which allows it to deploy Starlink-based satellite solutions in Kazakhstan.

More than 300 rural settlements were connected to the internet, the Unified Internet Access Gateway (UIAG) and the Unified Transport Environment of State Bodies (UTE SB). Customers of Transtelecom JSC's Starlink satellite internet service include Kazpost JSC, Kazakhtelecom JSC, PetroRetail LLP and over 100 other Kazakhstani companies.

An L2VPN service was developed and launched commercially over the Company's infrastructure, the first of its kind in Asia.

The Company was also the first in the world to obtain a licence to sell Starlink services commercially to individuals, both in Kazakhstan and in the wider region.

At the same time, the core infrastructure for localising Starlink traffic in Kazakhstan was put in place: a SpaceX ground station and PoP were connected, routing traffic through Transtelecom JSC network and on to international channels.

In addition, 592 devices were connected under the SNP 2.0 project, bringing modern communications to remote settlements and facilities with limited or no access to terrestrial telecom infrastructure.

Together, these projects lay the foundation for further growth in satellite services and wider digital access across Kazakhstan.



DEVELOPMENT TELECOMMUNICATIONS INFRASTRUCTURE

ALONG ROADS

In 2025, the Ministry of Artificial Intelligence and Digital Development of the Republic of Kazakhstan and Transtelecom JSC signed an investment agreement to develop telecommunications infrastructure along the country's roads.

The project falls under the Accessible Internet national project and aims to close the coverage gaps: stretches of road where mobile service is absent or unreliable.

The project provides for more than 500 new antenna masts and mobile base stations along national and regional roads. It is being delivered without budget funding. The state's contribution is to allocate spectrum, grant tax preferences and guarantee stable investment conditions.

To make effective use of the new infrastructure, Transtelecom JSC plans to give mobile operators equal access to it on a shared basis. The project will extend mobile coverage and improve internet access on the country's roads.

AIQYN PROJECT: DIGITAL MODERNISATION OF SCHOOLS

One of the notable events of 2025 was Transtelecom JSC presentation of AIQYN, a project for the comprehensive modernisation of school IT infrastructure in Shymkent.

It was presented in the presence of Gani Beissembayev, Minister of Education of the Republic of Kazakhstan, and Gabit Syzdykbekov, Mayor of Shymkent.

AIQYN covers a full upgrade of the digital infrastructure in educational institutions, including automated workstations, structured cabling systems, modern video surveillance and analytics systems, and high-speed internet access for the city's schools.

The project is intended to create a modern, safe and technologically advanced learning environment for pupils and teachers. AIQYN also provides a basis for developing school digital infrastructure further and rolling out similar solutions in other regions of Kazakhstan.

Transtelecom JSC

SUSTAINABLE DEVELOPMENT

IN INTEGRATING SUSTAINABILITY INTO ITS OPERATIONS, TRANSTELECOM JSC FOLLOWS THE 17 SUSTAINABLE DEVELOPMENT GOALS



025 HR policy
032 Health and safety
033 Environmental protection
034 Procurement

In integrating sustainability into its operations, Transtelecom JSC follows the 17 United Nations Sustainable Development Goals (SDGs). The Company recognises the environmental and social challenges reflected in the SDGs and takes them into account in how it operates.

The Company's sustainability policy rests on responsible business conduct, innovation-led development and a focus on creating long-term value. This approach supports sustainable economic growth, better environmental performance and social wellbeing.

Transtelecom JSC focuses on:

- improving quality of life in the regions where it operates;
- raising service quality through innovative technology;
- delivering social and educational programmes;
- reducing its environmental impact;
- ensuring transparency and accountability to stakeholders.

THE PRINCIPLES THE COMPANY HAS COMMITTED TO:

1. **Human rights:**
   - Supporting and respecting the human rights proclaimed by the international community.
   - Ensuring no involvement in any violation of those rights.
2. **Labour relations:**
   - Supporting freedom of association and the right to collective bargaining.
   - Opposing all forms of forced and child labour.
   - Eliminating discrimination in work and employment.
3. **Environmental protection:**
   - Preventing harm to the environment.
   - Strengthening environmental accountability.
   - Introducing and promoting environmentally sound technologies.
4. **Countering corruption**
   - Countering corruption in all its forms, including extortion and bribery.

Sustainable development is an integral part of Transtelecom JSC strategy. Information technology, the foundation of the telecom sector, is deeply embedded in the company's operations and serves as an important driver of growth.

The Company works systematically to improve people's quality of life, drawing on modern digital solutions and the professional expertise of its team.

Responsibility for delivering the sustainability strategy:

- **The Board of Directors** sets the strategic direction and approves the annual report.
- **The Chairman of the Management Board and managing directors** deliver the strategy and development plan, embed sustainability principles and ensure reliable disclosure.
- **The Chairman of the Management Board** is personally accountable for corporate social responsibility, the environment, occupational health and safety, and effective engagement with stakeholders.



HR POLICY

Transtelecom JSC is steadily building an effective system of personnel management and corporate culture, based on the core values that underpin all its HR processes:

Respect: recognising the values and goals of clients, partners and even competitors; being open to dialogue, listening and balancing interests within the framework of corporate ethics.

Continuous improvement: constant work on service quality, employee development, and the optimisation of business processes and the organisational structure.

Reliability: building the Company's reputation as a stable and socially responsible employer, a dependable partner and a law-abiding market player.

KEY FIGURES FOR 2025:

2,870 employees on the payroll at year end

17.9 bln KZT in staff costs

706 mln KZT in social expenditure

220 students completed work placements at the Company

Headcount Trends

Indicator	Unit	2021	2022	2023	2024	2025
Total employees	people	3,358	3,453	3,197	2,764	**2,870**
Staff costs	KZT mil-lion	11,955	14,767	13,014	17,113	**17,968**

Between 2021 and 2025, the Company's headcount changed as the organisational structure was optimised and business processes transformed.

After rising from 3,358 employees in 2021 to 3,453 in 2022, headcount fell over the following two years, to 3,197 in 2023 and 2,764 in 2024. By the end of 2025 it had grown to 2,870, which points to a stabilising workforce and a gradual recovery in numbers in line with business needs.

Staff costs, meanwhile, have risen steadily, from KZT 11,955 million in 2021 to KZT 17,968 million in 2025. The increase reflects the Company's policy of raising pay levels, salary indexation and keeping remuneration competitive, despite the changes in overall headcount.

Ratio of Women's to Men's Remuneration by Staff Category

Indicator	Unit	2025
Total employees	people	2,747
Staff costs	KZT million	17,968
Ratio of women's to men's renumeration, of which		
Managers	%	14.4
Specialists/administrative staff	%	57.3

Workforce composition

At the end of 2025, men made up 64.6% of the Company's workforce and women 35.4%. This reflects the nature of the industry, since a large share of employees work in technical and operational roles.

WORKFORCE STRUCTURE BY GENDER

35.4% – women
64.6% – men



Workforce Structure by Gender at End-2025

		Total	Workforce category		
			Managers	Specialists/ administrative staff	Workers
Headcount	people	**2,747**	392	1,868	485
	%	**100**	14.3	68.0	17.7
of which:					
men	people	**1,529**	275	1,140	112
	%	**55.7**	10.0	41.6	4.1
women	people	**1,218**	117	728	373
	%	**44.3**	4.3	26.5	13.5

Workforce Structure by Age Group

		Total	Workforce category 2025		
			Managers	Specialists/ administrative staff	Workers
Headcount	people	**2,747**	392	1,868	485
	%	**100**	14.3	68.0	17.7
of which:					
under 34	people	**1,054**	26	939	89
	%	**38.4**	1.0	34.2	3.2
35-44	people	**828**	189	527	112
	%	**30.1**	6.9	19.1	4.1
45 and over	people	**865**	177	404	284
	%	**31.5**	6.4	14.7	10.4

WORKFORCE BY AGE GROUP

The average age of employees is 38. The Company has a balanced age profile:

- **Under 34 – 38.4%:** building the talent pipeline and bringing in young professionals.
- **35–44 – 30.1%:** management potential and professional maturity.
- **45 and over – 31.5%:** stability, expertise and the transfer of experience.

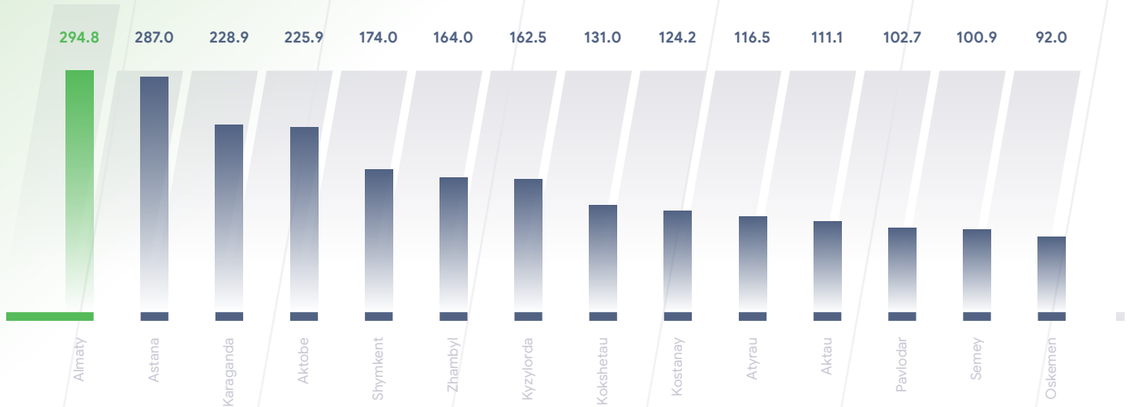
The average age of the Company's employees is 38, which indicates a balanced age profile. The largest group is employees under 34 (38.4%), who bring in young professionals and build the Company's talent base. Employees aged 35 to 44 account for 30.1%, reflecting a substantial number of people with strong professional and managerial experience. Employees aged 45 and over make up 31.5%, providing continuity of knowledge, retaining expert competencies and keeping operations stable. This distribution helps maintain a balance between developing new talent and preserving accumulated professional experience.

At the end of 2025, the Company's headcount stood at 2,747. The largest group is specialists and administrative staff, at 1,868 people (68.0%), which matches the nature of the Company's business and reflects the high proportion of employees delivering its core processes. Managers account for 392 people (14.3%) and workers for 485 (17.7%).

The age profile across job categories shows a balanced distribution. Among specialists and administrative staff, employees under 34 predominate, at 939 people (34.2% of total headcount), which points to a substantial talent base and a steady intake of young professionals. Among managers, the largest groups are those aged 35 to 44 (189 people) and 45 and over (177 people), reflecting a concentration of management experience and professional expertise. Among workers, those aged 45 and over predominate (284 people), showing a high proportion of experienced staff with the operational skills the work requires.

Overall, the workforce structure by job category and age group provides an optimal mix of young professionals, experienced employees and staff with deep expertise, which supports continuity of knowledge and the sustainable development of the Company's talent base.

Workforce by region



Organisation	Headcount	% of total
Head office	554	19%
Almaty	295	10%
Astana	287	10%
Karaganda	229	8%
Aktobe	226	8%
Shymkent	174	6%
Zhambyl	164	6%
Kyzylorda	163	6%
Kokshetau	131	5%
Kostanay	124	4%
Anytau	117	4%
Aktau	111	4%
Pavlodar	103	4%
Semey	101	4%
Oskemen	92	3%

Staff turnover and recruitment

In 2025, turnover fell in most job categories, which points to a more stable workforce and the effectiveness of the Company's HR initiatives.

The sharpest fall was among top management: after rising to 48.7% in 2024, turnover dropped to 2.1% in 2025. This indicates a settled senior team, continuity in management and a stable corporate governance system.

Managers show a similarly positive trend. Turnover fell from 25.2% in 2023 to 9.3% in 2025, reflecting strong retention of management staff and helping preserve management effectiveness.

There was a substantial improvement among administrative staff, where turnover fell from 81.4% in 2023 to 5.1% in 2025. This reflects greater workforce stability and the effectiveness of the Company's onboarding and retention measures.

Turnover among workers also remains relatively low. Although it rose slightly compared with 2024 (from 10.5% to 14.6%) it is well below the 2023 level of 42.8%, confirming that the positive trend is holding.

Turnover remains highest among specialists, however, at 68.9% in 2025. The figure has risen compared with previous years, reflecting strong competition in the labour market for qualified specialists, the career mobility of this group and changes in the Company's staffing structure.

Overall, the 2025 results show a stabilising workforce. Lower turnover among top management, managers, administrative staff and workers points to a more effective personnel management system, better retention conditions and a more resilient talent base. The priority going forward remains attracting and retaining specialists, as this is the category with the greatest influence on overall turnover.

Staff turnover by job category, %



Staff turnover by gender and age groups

№	Organisation	Headcount	% of total	Number of employees dismissed during the reporting year, by gender group		Number of employees dismissed during the reporting year by age group		
				f	m	under 34	35–44	45 and above
1	Karaganda	228.9	7.98%	12	24	16	13	7
2	Semey	100.9	3.52%	7	13	12	7	1
3	Oskemen	92	3.21%	5	17	12	7	3
4	Pavlodar	102.7	3.58%	7	11	14	1	3
5	Kostanay	124.2	4.33%	7	18	16	5	4
6	Kokshetau	131	4.57%	5	18	11	7	5
7	Aktau	111.05	3.87%	4	21	8	13	4
8	Atyrau	116.5	4.06%	7	11	11	1	6
9	Aktobe	225.9	7.87%	20	50	36	28	6
10	Almaty	294.8	10.27%	36	20	29	12	15
11	Shymkent	174	6.06%	9	13	12	3	7
12	Kyzylorda	162.5	5.66%	5	11	6	6	4
13	Zhambyl	164	5.72%	7	26	18	8	4
14	Astana	287	10.00%	43	39	53	23	6
15	Head office	554	19.31%	41	74	51	36	28
	Total	2,869.5		215	366	305	170	103

Voluntary and involuntary turnover rates

№	Organisation	Headcount	% of total	Voluntary and involuntary turnover rates			
				voluntary	%	involuntary	%
1	Karaganda	228.9	7.98%	36	15.7%	0	
2	Semey	100.9	3.52%	20	19.8%	0	
3	Oskemen	92	3.21%	22	23.9%	0	
4	Pavlodar	102.7	3.58%	14	13.6%	4	3.9%
5	Kostanay	124.2	4.33%	23	18.5%	2	1.6%
6	Kokshetau	131	4.57%	23	17.6%	3	2.3%
7	Aktau	111.05	3.87%	20	18.0%	5	4.5%
8	Atyrau	116.5	4.06%	11	9.4%	7	6.0%
9	Aktobe	225.9	7.87%	67	29.7%	3	1.3%
10	Almaty	294.8	10.27%	56	19.0%	0	
11	Shymkent	174	6.06%	22	12.6%	0	
12	Kyzylorda	162.5	5.66%	16	9.8%	0	
13	Zhambyl	164	5.72%	20	12.2%	10	6.1%
14	Astana	287	10.00%	82	28.6%	0	
15	Head office	554	19.31%	113	20.4%	2	0.4%
	Total	2,869.5		545		36	

Number and percentage of employees hired during the reporting year by gender, age group, and region

№	Organisation	Headcount	% of total	Number and percentage of employees hired in the reporting year		Number of employees hired in the reporting year, by gender		Number of employees hired in the reporting year, by age		
				N	%	f	m	up to 34	35–44	45 and over
1	Karaganda	228.9	7.98%	35	15.3%	10	25	19	10	6
2	Semey	100.9	3.52%	12	11.9%	4	8	10	2	
3	Oskemen	92	3.21%	19	20.7%	6	13	12	3	4
4	Pavlodar	102.7	3.58%	21	20.4%	7	14	16	3	2
5	Kostanay	124.2	4.33%	23	18.5%	10	13	13	6	4
6	Kokshetau	131	4.57%	23	17.6%	7	16	11	10	2
7	Aktau	111.05	3.87%	24	21.6%	7	17	8	12	4
8	Atyrau	116.5	4.06%	13	11.2%	3	10	8	4	1
9	Aktobe	225.9	7.87%	62	27.4%	18	44	8	48	4
10	Almaty	294.8	10.27%	60	20.4%	23	37	37	19	4
11	Shymkent	174	6.06%	20	11.5%	5	15	19	1	
12	Kyzylorda	162.5	5.66%	17	10.5%	7	10	7	8	1
13	Zhambyl	164	5.72%	29	17.7%	21	8	20	4	5
14	Astana	287	10.00%	78	27.2%	33	45	61	13	4
15	Head office	554	19.31%	111	20.0%	33	78	67	37	7
	Total	2,869.5		547		194	353	316	180	48

IN 2025, THE COMPANY HIRED 547 EMPLOYEES

547

In 2025, the Company hired 547 employees, equivalent to 19.1% of total headcount. The largest intakes were at head office (111 employees) and in the Astana (78), Aktobe (62) and Almaty (60) branches, reflecting the staffing needs of those units.

Men made up the majority of new hires, at 353 people (64.5%), with 194 women (35.5%). This mirrors the Company's overall workforce structure and reflects the nature of its business, which involves a substantial share of technical and operational roles.

By age, most new hires were under 34: 316 people (57.8%), which shows the Company's focus on attracting young professionals and building its talent pipeline. Those aged 35 to 44 accounted for 180 people (32.9%) and those aged 45 and over for 48 (8.8%). This hiring pattern helps refresh the workforce while retaining the necessary level of professional experience.

The highest hiring rates relative to headcount were in the Aktobe (27.4%) and Astana (27.2%) branches, indicating active recruitment in those units. In most other branches, new hires accounted for between 10% and 22% of headcount, reflecting planned replacement of staff and the continuity of operations.

Social policy and collective agreements

The Company recognises the Industry Trade Union of Information and Communication Technology Workers, which represents employees and takes part in developing social partnership. Relations between Transtelecom JSC and its workforce are governed by the Collective Agreement for 2025, which sets out the mutual obligations of the parties on pay, social benefits and guarantees, occupational health, safe working conditions, professional development and the settlement of labour relations issues.

As at the reporting date, the Collective Agreement covers 91% of the Company's employees, indicating a high level of participation in the social partnership system. Implementing the Agreement improves employees' social protection, strengthens labour relations, supports a positive working climate and helps keep the workforce stable. Under the Agreement, employees receive additional social guarantees and benefits that go beyond the minimum requirements of Kazakhstan's labour legislation.

In 2025, the Company continued its social programmes aimed at improving employees' social protection, supporting family values, strengthening corporate culture and creating good working conditions.

Total social expenditure for the year was KZT 705.9 million, which is KZT 12.0 million (1.7%) above the approved plan of KZT 693.9 million. The small overrun was due to higher actual spending in certain areas of employee support.

The largest items of social expenditure were:

- corporate events for employees: KZT 112.9 million;
- financial assistance for preparing children for school: KZT 87.5 million;
- the Spartakiad sports event: KZT 71.6 million;
- compensation for employees' use of personal property: KZT 91.6 million;
- housing rent compensation: KZT 51.9 million.

During the reporting period, the Company maintained a wide range of targeted social support measures. Significant funds went to financial assistance on the birth of a child (KZT 32.0 million), employees' medical treatment (KZT 21.2 million), significant anniversaries (KZT 7.8 million) and funeral services (KZT 15.1 million), as well as support for employees with disabled children, single mothers and large families.

Actual spending exceeded plan in several areas. The largest variance was in financial assistance for medical treatment, where actual payments came to KZT 21.2

million against a plan of KZT 10.3 million, showing how much this support is needed. Spending also rose on compensation for the use of personal property, additional leave payments, financial assistance on the birth of a child, and corporate events.

Some items came in under plan. Retirement payments, for instance, totalled KZT 11.3 million against a plan of KZT 20.9 million, as fewer employees reached retirement age during the period. Spending on housing rent, children's gifts and social contributions was also below plan.

Overall, the year's results confirm the Company's continued high level of social responsibility and the consistent delivery of its policy of supporting employees and their families. These social programmes help improve employee engagement, strengthen loyalty and foster a positive working climate.

In 2025, four employees returned to work after maternity leave or parental leave, comprising two women and two men. These returns were recorded in the Pavlodar branch (one woman) and the Aktau branch (one woman and two men).

The Company gives employees who take maternity or parental leave the right to return to their previous position, in line with Kazakhstan's labour legislation. Its HR policy is designed to help preserve the employment relationship, support the balance between work and family responsibilities, and provide equal opportunities for all employees regardless of gender.

Total number of employees who took and returned from maternity/paternity leave during the reporting year, by gender

№	Organisaiton	F	M
1	Karaganda	0	0
2	Semey	0	0
3	Oskemen	0	0
4	Pavlodar	1	0
5	Kostanay	0	0
6	Kokshetau	0	0
7	Aktau	1	2
8	Atyrau	0	0
9	Aktobe	0	0
10	Almaty	0	0
11	Shymkent	0	0
12	Kyzylorda	0	0
13	Zhambyl	0	0
14	Astana	0	0
15	Head office	0	0
	Total	2	2



Personnel training and development

In 2025, training and development remained a priority of HR policy. A total of 1,815 employees received training (of total workforce of 2,869). The main focus was on digital technologies, administering and maintaining technical equipment, effective sales techniques and corporate governance to international standards, covering areas including network development, information technology, information security, data analytics, operational support, infrastructure modernisation and construction, the corporate secretary function, and specialist roles in the B2B, B2C and B2G segments.

Forty-three employees gained certifications, including the international Certificate in Company Direction from the QID Association of Independent Directors in partnership with the Institute of Directors (IoD) in the UK, along with training in information security, IT support, networks, occupational safety, risk management and accounting. Mandatory training was also delivered in civil defence and site access requirements (covering health and safety, fire safety, electrical safety, working at height, etc.).

Average training hours per employee, by gender and staff category:

- Average training hours – 16 hours
- Total employees trained – 1,815

By gender:

- Men – 1,553 p.
- Women – 262 p.

By staff category:

- OS (operational staff) – 1,687 p.
- AMS (administrative and management staff) – 128 p.

Work placements and university partnerships

Transtelecom JSC continues to work with universities in Kazakhstan.

In 2025, 23 new agreements were signed, and 309 students completed work and pre-graduation placements in the Company's business units, 12 of whom were subsequently hired. The Company's employer brand work is aimed at attracting young professionals into the ICT sector.



43
employees – gained certifications

16
hours – average training hours

1,815
employees – total trained

Recognition and awards

In 2025, the Company's non-financial incentive system included its annual awards for outstanding employees and teams. A total of 331 employees were recognised, 267 in the branches and 64 at head office.

The Best Team 2025 competition was held across nine categories (by line of business). Winners were selected on the basis of operational results and teamwork. 178 employees received certificates and cash bonuses.

To mark Communications Workers' Day and Republic Day, 51 employees received departmental awards from the Ministry of Digital Development and the Ministry of Artificial Intelligence, including 12 recipients of the Uzdik Baylanysshy (Outstanding Communications Worker) and Uzdik Tsifrlandyrushy (Outstanding Digitaliser) badges and three recipients of the Enbek Ardageri (Veteran of Labour) medal.

A further 36 employees received certificates of merit and letters of appreciation from the Ministry of Digital Development, Innovations and Aerospace Industry/Ministry of Artificial Intelligence and Digital Development.

HEALTH AND SAFETY

Accidents:
No work-related accidents were recorded at the Company in 2025. The safety record, counted from the last incident, stood at 658 days.

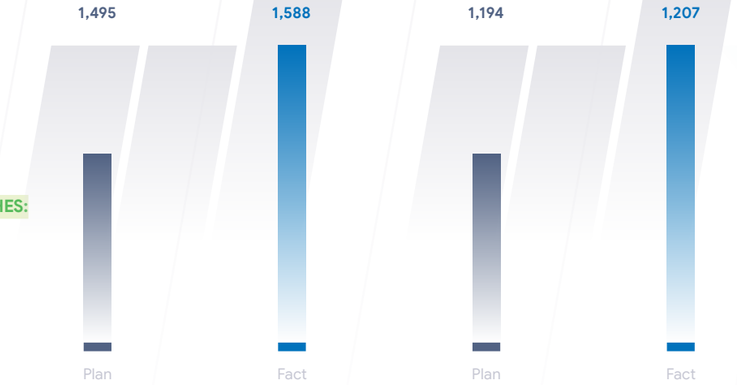
Last recorded accident:
On 12 March 2024, a road traffic accident at the Shymkenttranstelecom branch resulted in a serious injury to an employee.

Response measures:
- An unscheduled safety briefing was held.
- A guide to safe vehicle operation was introduced.
- Internal health and safety controls were tightened.

Corporate initiatives:
- World Day for Safety and Health at Work was marked.
- Processes in the Near Miss system were automated.
- New procedures and monitoring tools were introduced.
- Greater emphasis was placed on transport safety, leadership, motivation and behavioural monitoring.

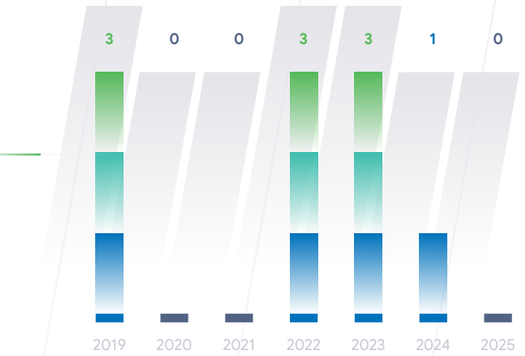
/ **PERIODIC MEDICAL EXAMINATIONS:** completed by 91% of employees.
/ **RATE OF REMEDYING IDENTIFIED BREACHES:** 99%.
/ **WORKPLACE ASSESSMENTS:** 93% of the plan completed.
/ **HEALTH AND SAFETY TRAINING:** delivered without taking employees off the job.

HEALTH AND SAFETY TRAINING

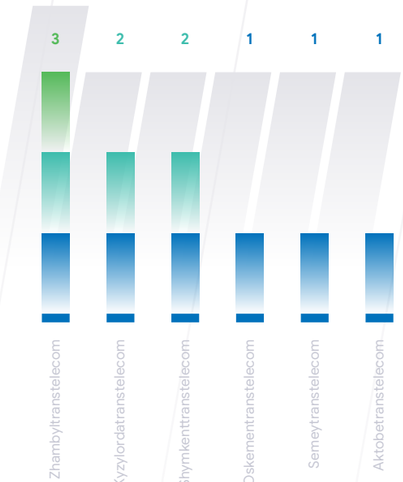


ELECTRICAL SAFETY TRAINING

Injury rate



Accidents by branch over the part 7 years



Social Projects

Support for community initiatives remains an important part of Transtelecom's work. The Company cooperates with WorldSkills Kazakhstan and Talap, helping to develop vocational and digital skills.

ENVIRONMENTAL PROTECTION

Environmental initiatives and approach to environmental protection

Transtelecom JSC operates in line with the principles of environmental responsibility and sustainable development. Although the telecom industry has a relatively low environmental impact, the Company pays close attention to complying with environmental legislation and using natural resources efficiently.

The Company has an Environmental Management System (EMS) in place, certified to the international ISO 14001 standard. In 2026 it successfully passed a surveillance audit against the standard's requirements.

The main areas of environmental activity are:

- controlling waste handling;
- meeting the established emission limits;
- preventing pollution;
- delivering measures that reduce the environmental impact.

Transtelecom JSC operates in full compliance with the environmental legislation of the Republic of Kazakhstan, including mandatory reporting, waste disposal contracts and sanitary and environmental standards. No breaches of environmental legislation or penalties were recorded during the reporting period.

The Company's environmental costs comprise payments for pollutant emissions and waste disposal, together with the administrative costs of meeting environmental requirements.

Transtelecom JSC's operations during the reporting period are assessed as environmentally safe and compliant with conservation standards. The Company reaffirms its commitment to sustainable development and continues working to reduce its impact on the environment.

Key resource consumption and waste generation indicators

№	Indicator	Value	Unit
1	Electricity (14 branches, not from own sources)	18,940,033	kWh
2	Thermal energy (not from own sources)	4,441,656	Gcal
3	Cold water (consumption)	21,040	m^3
4	Motor gasoline	931,996	l
5	Diesel fuel	153,200	l
6	Solid municipal waste, transferred to specialised organisations	39.7	tonnes
7	Decommissioned equipment, transferred	3.0	tonnes
8	Used cable products, transferred	0.807	tonnes
9	Hazardous waste	0 (none generated)	tonnes

Air emissions and climate impact

Transtelecom JSC consistently implements measures to reduce pollutant emissions into the atmosphere, including the introduction of energy-efficient and environmentally sound technologies. This work is managed through the Company's Environmental Management System, certified to ISO 14001.

Emissions for the reporting period:

- **Actual emissions: 10.10284 tonnes per year.**
- **Permitted limit: 12.28906 tonnes per year.**
- **Limit exceeded: no.**

The Company's branches obtain the necessary environmental permits in good time and submit the reports required by law to the competent government authorities each year.

No breaches of environmental legislation relating to air emissions were identified during the reporting period.

Greenhouse Gas Emissions, tCO_2e

Under the Environmental Code of the Republic of Kazakhstan, the Company's facilities fall into Category IV for environmental impact, which means no emission limits are set and Form 870.00 reporting is not required.

Indicator	Value
Scope 1 – petrol	2,152.91
Scope 1 – diesel	410.58
Scope 1, total	2,563.49
Scope 2 – electricity	15,549.77
Scope 2 – heat	1,376.91
Scope 2, total	16,926.68
Scope 3	Not assessed (deemed immaterial for Category IV)
Total GHG emissions	19,490.17

Energy Consumption, GJ

Energy source	Value	GJ
Electricity	18,940,033 kWh	68,184.12
Heat	4,441.656 Gcal	18,596.33
Motor petrol	931,996 l	~30,010.27
Diesel fuel	153,200 l	~5,913.52
Total energy consumption	–	~122,704.24

Waste management

Indicator	Value
Total waste generated and transferred	43.507 tonnes
of which hazardous waste	0 tonnes (0%)

In 2025, the waste generated was transferred to third-party contractors within the established limits, as set out in the hazardous waste passport:

Waste type	Volume in 2025 (tonnes)	Established limit (tonnes)	Status
Municipal solid waste	39.7	40.0	Within limit
Decommissioned equipment	3.0	4.0	Within limit
Used cable products	0.807	1.2	Within limit

PROCUREMENT

Transtelecom JSC procures goods, works and services in accordance with its internal Procurement Policy and Procurement Management Rules. All supplier selection procedures are formally regulated and run through the electronic procurement system at eep.mitwork.kz. For single-source procurement, market prices are analysed against the criteria of fair competition and best value for money. The Company continually updates its internal regulations to make the procurement system more transparent and effective.

Transtelecom JSC

5 CORPORATE GOVERNANCE

CORPORATE GOVERNANCE IS ONE OF THE KEY ELEMENTS OF THE COMPANY'S SUSTAINABLE DEVELOPMENT AND AN IMPORTANT FACTOR IN BUILDING ITS LONG-TERM VALUE



036 Corporate governance overview
038 Board of Directors
045 Executive body
045 Values and business ethics
045 Conflict of interest
046 Countering corruption
047 Countering terrorist threats
048 Risk management
051 Internal audit service
052 Information security
052 Quality management

CORPORATE GOVERNANCE OVERVIEW

Corporate governance is one of the key elements of the Company's sustainable development and an important factor in building its long-term value.

An effective governance system supports sound management decisions, improves operational efficiency, ensures proper risk management and strengthens internal control.

The Company sees corporate governance as an essential foundation for achieving its strategic goals, operating transparently and maintaining the trust of shareholders, investors, partners and other stakeholders. It continues to improve its governance practices in line with the requirements of Kazakhstani law, its own corporate documents and best international standards.

This work aims to balance the interests of shareholders and other stakeholders, improve the quality of decision-making, strengthen the accountability of the governing bodies and create the conditions for sustainable growth and long-term development of the Company.

CORE PRINCIPLES

Corporate governance follows the Corporate Governance Code approved by the General Meeting of Shareholders on 2 March 2022. The Code's core principles are:

- Protecting the rights and legitimate interests of shareholders.
- Effective performance of the Board of Directors and the Management Board.
- Transparent and reliable disclosure.
- Legality, ethical conduct and management accountability.
- Managing corporate conflicts and conflicts of interest.
- Developing people and protecting the environment.

Corporate governance structure

The governance framework comprises the Board of Directors, the Management Board, internal audit and a hotline for confidential reporting of misconduct. The Company applies a systematic approach to risk management, internal control and management decision-making that supports its financial stability.



Share Capital

Under Resolution No. 280 of the Government of the Republic of Kazakhstan of 31 March 2014, "On approving the Comprehensive Privatisation Plan for 2014–2016," Transtelecom JSC was included in the list of companies to be privatised and transferred to the competitive market.

As of 31 December 2025, the shareholding structure was:

- **Kazakhstan Temir Zholy NC JSC – 25% plus one share.**
- **Unit Telecom LLP – minus one share.**

There were no changes to share capital in 2025.

Authorised ordinary shares total 6,471,089, of which 5,638,097 have been issued and 832,992 remain unissued.

The par value of a share is KZT 1,000. Proceeds raised from share issues amount to KZT 12.2 billion.

Bonds

On 22 July 2019, the Board of Directors resolved to issue bonds on the domestic market for up to KZT 22 billion, with a coupon of 11.5% per annum and a 12-year term. On 10 January 2020, Baiterek National Managing Holding JSC purchased KZT 10 billion of these bonds. In January 2023, Transtelecom JSC redeemed KZT 2 billion of bonds early.

On 19 November 2021, following a Board resolution of 27 October 2021, the Company issued KZT 15 billion of bonds with a coupon of 13.0% per annum and a seven-year term.

Major transactions

Transtelecom's revenue for 2025 was KZT 87.97 billion.

Growth came from business diversification, the development of the B2Cloud, B2SP and B2C segments, and international operations.

The Company established an in-house project institute, signed a contract with Yandex.Cloud and delivered projects with NIT JSC, KAZ Minerals and others.

General Meeting of Shareholders

The General Meeting of Shareholders is the Company's supreme governing body.

Its remit and the procedure for holding meetings are set out in the Charter and in the Regulations of 4 August 2016 (Minutes No. 1).

Transtelecom JSC ensures equal rights and protection of interests for all shareholders.

87.97
KZT billion revenue for 2025

6,471,089
authorised ordinary shares total

1,064.19
KZT the dividend per ordinary share

Dividends

For 2023, under the resolution of the General Meeting of Shareholders of 27 January 2025, KZT 6 billion was allocated to dividend payments.

The dividend per ordinary share was KZT 1,064.19.

BOARD OF DIRECTORS

The Board of Directors provides overall direction for the Company's activities, except on matters reserved to the General Meeting of Shareholders.

The Board of Directors plays a central role in establishing and developing the corporate governance system, protecting and giving effect to shareholders' rights, and overseeing the executive body.

The procedure for forming the Board, its remit, and the arrangements for convening and holding its meetings are set out in the Charter and the Regulations on the Board of Directors (approved by the General Meeting of Shareholders on 4 August 2016, as subsequently amended).

The Board's remit includes:

- setting the Company's priority areas of activity and development strategy;
- overseeing and assessing the effectiveness of the internal control and risk management systems;
- determining the size and term of office of the executive body, and appointing the Head of Internal Audit and the Corporate Secretary;
- convening annual and extraordinary General Meetings of Shareholders, and reviewing in advance the matters to be put before them;
- approving the Company's Development Plan and monitoring its implementation;
- approving total headcount and the structure of the head office of the Company;
- approving the scorecards of the Chairman and members of the Management Board, the Head of Internal Audit and the Corporate Secretary, together with the KPI definitions;
- approving the Company's internal documents, other than those reserved to the General Meeting of Shareholders or the executive bodies.

Composition of the Board of Directors

MEMBERS OF THE BOARD OF DIRECTORS ARE ELECTED BY THE GENERAL MEETING OF SHAREHOLDERS.

Board of Directors as of 31 December 2025

Board Member	Date elected	Status
Nurlan Ulanovich Aryngaziyev	11 December 2025	Chairman of the Board of Directors, Independent Director
Anuar Muratovich Akhmetzhanov	25 July 2023	Shareholder representative
Kaspars Kukelis	11 December 2025	Shareholder representative
Timur Muslimovich Iskakov	11 December 2025	Shareholder representative
Berik Mustayuly Otemurat	11 December 2025	Independent Director
Galymzhan Ualkhanovich Ib-raimov	25 July 2023	Independent Director
Suyenish Tuleukhanovich Ab-dildin	11 December 2025	Chairman of the Management Board

Independence Criteria for Directors, the Chairman of the Management Board and Members of Board Committees

Independent Directors play an important role in the effective work of the Board of Directors, supporting objective and balanced decisions on the Company's strategic development, risk management, internal control and the protection of shareholders' rights and interests.

Independent Directors are elected by the General Meeting of Shareholders through transparent procedures set out in the Regulations on the Board of Directors of the Company, taking into account professional competence, experience, business reputation, leadership qualities and other criteria needed to perform the role of the Board of Directors' member effectively.

Activity of the Board of Directors in 2025

As of 31 December of the reporting year, the Company's Board of Directors comprised seven members, three of whom were Independent Directors. This gives an independent perspective on key matters and supports decisions taken in the interests of all shareholders.

The Board of Directors' committees are made up exclusively of Independent Directors, which improves the objectivity and quality of the recommendations they produce.

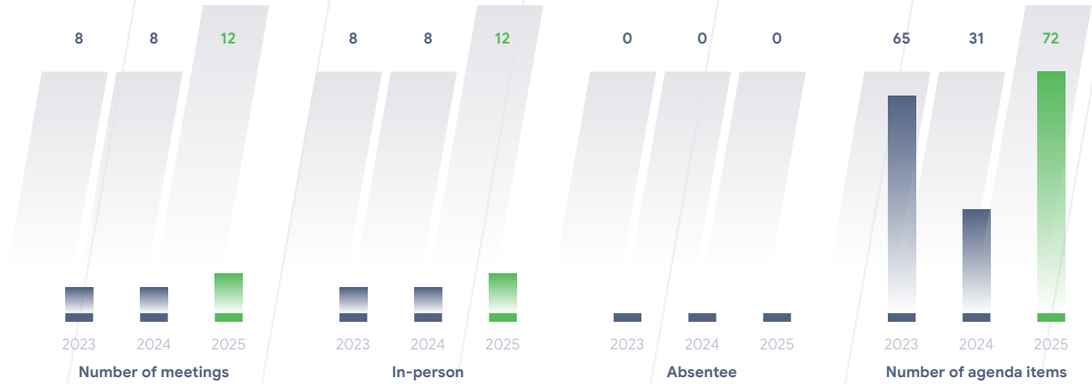
Throughout the reporting period, all the Company's Independent Directors met the independence criteria set out in the Law of the Republic of Kazakhstan "On Joint-Stock Companies" and the additional requirements in the Company's internal documents.

When selecting candidates for the role of an Independent Director, the Company pays particular attention to professional expertise in the relevant fields, an understanding of corporate governance, financial control and risk management, knowledge of the industry, and an impeccable business reputation and high ethical standards.

Independent Directors must also have sufficient time to participate fully in the work of the Board of Directors and its committees, including reviewing materials in advance and preparing for the matters on the agenda.

Neither Kazakhstani law nor the Company's internal documents impose independence requirements on the Chairman of the Management Board.

Information on Board of Directors' Meetings



NUMBER OF MEETINGS AND ATTENDANCE BY MEMBERS OF THE BOARD OF DIRECTORS

The Company's Board of Directors works to approved annual work plans. Twelve Board of Directors' meetings were held during the reporting year, all of them in person, with none held by absentee voting.

The Board of Directors considered 72 matters in 2025, all of them at in-person meetings.

The table below shows meeting statistics of the Board of Directors and the number of matters considered over the past three years:

Attendance at the Meetings of the Company's Board of Directors

№	Full name of the Board of Directors' Member	Period on the Board of Directors in 2025	Meetings attended	Attendance, %
1	Nurlan Ulanovich Aryn-gaziyev	01.01.2025 – 31.12.2025	12 of 12	100
2	Anuar Muratovich Akhmetzhanov	01.01.2025 – 31.12.2025	12 of 12	100
3	Galymzhan Ualkha-novich Ibraimov	01.01.2025 – 31.12.2025	12 of 12	100
4	Dmitriy Aleksandrovich Pokupatelev	01.01.2025 – 11.12.2025	10 of 10	100
5	Vyacheslav Anatolyevich Anikhovskiy	01.01.2025 – 11.12.2025	10 of 10	100
6	Kairat Takirovich Balykbayev	01.01.2025 – 05.05.2025	2 of 2	100
7	Andrey Aleksandrovich Marchenko	01.01.2025 – 05.05.2025	2 of 2	100
8	Kaspars Kukelis	11.12.2025 – 31.12.2025	2 of 2	100
9	Timur Muslimovich Is-kakov	11.12.2025 – 31.12.2025	2 of 2	100
10	Berik Mustayuly Otemu-rat	11.12.2025 – 31.12.2025	2 of 2	100
11	Suyenish Tuleukha-novich Abdildin	11.12.2025 – 31.12.2025	2 of 2	100

KEY MATTERS CONSIDERED BY THE BOARD OF DIRECTORS IN 2025

During the reporting period, the Board of Directors considered both strategic and current matters within its remit. Details of the matters considered and the decisions taken are recorded in the minutes and resolutions of the Board of Directors.

Over the reporting period, the Board of Directors addressed a wide range of matters aimed at ensuring the Company operates effectively, including the following.

1. **Financial and business performance of the Company**
- Reviewing reports on budget performance of Transtelecom JSC.
- Approving the Transtelecom JSC budget for 2025.

2. **Corporate governance and personnel matters**
- Electing the chairs and members of the Board of Directors committees.
- Approving the Board of Directors' work plan and schedule for 2025.
- Reviewing the 2024 reports of the Board of Directors' committees.
- Electing members of the Management Board of Transtelecom JSC, and determining their terms of office and remuneration.
- Reviewing and approving, in advance of the General Meeting of Shareholders, amendments to the Transtelecom JSC Charter.
- Approving the report on the Board of Directors' work for 2024.
- Electing members of the Supervisory Board of TTS RailTech LLP.
- Amending the Charter of TTS RailTech LLP.

3. **Internal audit and risk management**
- Approving risk reports.
- Approving the Transtelecom JSC risk register and risk map for 2025.
- Approving the Transtelecom JSC risk appetite for 2025.
- Approving the annual report of the Internal Audit Service.
- Approving the Internal Audit Service's annual audit plan for 2025.
- Appointing and dismissing Internal Audit Service staff and setting their remuneration.

MEASURES TAKEN BY THE BOARD OF DIRECTORS TO TAKE INTO ACCOUNT SHAREHOLDERS' VIEWS REGARDING THE COMPANY

To ensure that shareholders' views on the Company's activities are taken into account, the Board of Directors includes representatives of both shareholders on an equal footing.

These representatives take part in considering the matters on the Board of Directors' agenda and set out the shareholders' position on them. That position is recorded in the minutes of Board of Directors' meetings and taken into account by Board of Directors' members when discussing and deciding agenda items.

Through their representatives on the Board of Directors, shareholders may initiate consideration of matters affecting their interests and submit proposals to the Board of Directors of Transtelecom JSC.

As the body representing shareholders' interests, the Board of Directors ensures that any enquiries and proposals received from shareholders are considered, and takes the necessary steps within its remit.

During the reporting period, the Board of Directors received no enquiries, proposals or other representations from shareholders regarding the Company's activities.

Activity of the Board of Directors' Committees

To improve the quality of decisions of the Board of Directors, Transtelecom JSC has three Board committees, which examine the most important matters in detail beforehand and prepare recommendations:
- the Audit Committee;
- the Nomination and Remuneration Committee;
- the Strategic Planning Committee.

Under the regulations governing the committees, each reports to the Board of Directors annually on its work.

THE AUDIT COMMITTEE OF THE BOARD OF DIRECTORS IN 2025

The Audit Committee of the Board of Directors of Transtelecom JSC (hereinafter referred to as the Committee) operates in accordance with the Regulations on the Audit Committee of the Board of Directors, approved by a Board of Directors' resolution of 17 March 2017 (Minutes No. 2/2017). The Committee supports thorough and detailed consideration of matters within the Board of Directors' remit and improves the quality of decisions taken.



Under the Company's Charter, establishing Board committees, approving their regulations and electing their chairs and members fall within the Board's remit.

On 11 March 2025, Independent Director Vyacheslav Anatolyevich Anikhovskiy was elected chair of the Committee, in accordance with the requirements of Kazakhstani law and international corporate governance best practice. From 15 December 2025, Independent Director Berik Mustayuly Otemurat was elected chair.

By Board resolution of 11 March 2025 (Minutes No. 1/2025), the Audit Committee comprised:

- **V.A. Anikhovskiy –** Committee Chair – Independent Director;
- **N.U. Aryngaziyev –** Committee member – Independent Director;
- **G.U. Ibraimov –** Committee member – Independent Director.

By Board resolution of 15 December 2025 (Minutes No. 11/2025), the Audit Committee was reconstituted as follows:

- **Berik Mustayuly Utemurat –** Chair – Independent Director;
- **Nurlan Ulanovich Aryngaziyev –** Committee member – Independent Director;
- **Galymzhan Ualkhanovich Ibraimov –** Committee member – Independent Director.

As of 31 December 2025, the Audit Committee therefore comprised:

Audit Committee composition

№	Full name	Position	Committee member since:
1	**Berik Mustayuly Otemurat**	Transtelecom JSC Independent Director, Chair of the Committee	15 December 2025
2	**Nurlan Ulanovich Aryngaziyev**	Transtelecom JSC Independent Director, Member of the Committee	15 December 2025
3	**Galymzhan Ualkhanovich Ibraimov**	Transtelecom JSC Independent Director, Member of the Committee	15 December 2025

TO IMPROVE THE QUALITY OF DECISIONS OF THE BOARD OF DIRECTORS, TRANSTELECOM JSC HAS THREE BOARD COMMITTEES

The Committee held five in-person meetings during the reporting period, covering all matters within its remit. It considered 15 items in line with the meeting agendas and issued recommendations to the Board of Directors on each.

Internal audit matters

The Committee considered and made recommendations to the Board of Directors on:

- preliminary approval of the Internal Audit Service's report for 2024;
- preliminary approval of the Internal Audit Service's audit plan for 2025;
- recommendations on the term of office of the Internal Audit Service, and on appointing an Internal Audit Service employee, setting their term of office and salary;
- approval of the KPI scorecard with actual results, and calculation of the remuneration due to the Head of Internal Audit for 2024;
- recommendations on the early termination of the Head of Internal Audit's appointment, and on appointing a successor, setting their term of office and salary;
- approval of the KPI scorecard for the Head of Internal Audit of Transtelecom JSC;
- a proposal on the early termination of an Internal Audit Service employee's appointment, and recommendations on appointing new Internal Audit Service staff, setting their terms of office and salaries;
- an extension of the deadline for implementing the recommendations arising from the audit of HR processes.

Internal control and risk management matters

The Committee considered and made recommendations to the Board of Directors on:

- preliminary review and approval of amendments to the Risk Management and Internal Control Policy, approved by a Board of Directors of Transtelecom JSC resolution of 29 December 2021;
- preliminary approval of the Transtelecom JSC risk report as of 31 December 2024;
- preliminary approval of the Transtelecom JSC risk register and risk map for 2025;
- preliminary approval of the Transtelecom JSC risk appetite for 2025;
- preliminary approval of the Transtelecom JSC risk report as at 31 March 2025.

Financial reporting and external audit matters

- None were brought before the Committee.

Organisational matters and matters relating to the work of the Board of Directors

The Committee considered and made recommendations to the Board of Directors on:

- electing a chair for the current Audit Committee meeting of Transtelecom JSC;
- preliminary review of the Audit Committee's report of Transtelecom JSC for 2024.

Audit Committee attendance in 2025

№	Full name	Meetings held	Meetings attended	Attendance (%)
1	Vyacheslav Anatolyevich Anikhovskiy	5	5	100
2	Galymzhan Ualkhanovich Ibraimov	5	5	100
3	Nurlan Ulanovich Aryngaziyev	5	5	100
4	Berik Mustayuly Otemurat	0	0	-

ACTIVITY OF THE NOMINATION AND REMUNERATION COMMITTEE OF THE BOARD OF DIRECTORS IN 2025

The Nomination and Remuneration Committee of the Board of Directors of Transtelecom JSC (hereinafter referred to as the Committee) was established by a resolution of the Board of Directors dated 31 August 2016.

The Committee operates in accordance with the Regulations on the Nomination and Remuneration Committee, approved by a Board resolution of 31 August 2016, Minutes No. 6/2016.

The Committee supports thorough and detailed consideration of matters within the Board of Directors' remit and improves the quality of decisions taken.

Under the Company's Charter, establishing Board committees, approving their regulations and electing their chairs and members fall within the Board of Directors' remit.

Independent Director Galymzhan Ualkhanovich Ibraimov was elected chair of the Committee, in accordance with the requirements of Kazakhstani law and international corporate governance best practice.

By Board resolution of 6 September 2023 (Minutes No. 6/2023), the Nomination and Remuneration Committee comprised:

- **G.U. Ibraimov –** Chair of the Committee – Independent Director;
- **B.M. Otemurat –** member of the Committee – Independent Director;
- **V.A. Anikhovskiy –** member of the Committee – Independent Director.

By Board resolution of 11 March 2025 (Minutes No. 1/2025), the Nomination and Remuneration Committee was reconstituted as follows:

- **G.U. Ibraimov –** Chair of the Committee – Independent Director;
- **V.A. Anikhovskiy –** member of the Committee – Independent Director;
- **N.U. Aryngaziyev –** member of the Committee – Independent Director.

By Board resolution of 15 December 2025 (Minutes No. 11/2025), the Nomination and Remuneration Committee was reconstituted as follows:

- **Galymzhan Ualkhanovich Ibraimov –** Chair of the Committee – Independent Director;
- **Nurlan Ulanovich Aryngaziyev –** member of the Committee – Independent Director;
- **Berik Mustayuly Otemurat –** member of the Committee – Independent Director.

As of 31 December 2025, the Nomination and Remuneration Committee of the Board of Directors of Transtelecom JSC therefore comprised:

№	Full name	Position	Committee member since:
1	Galymzhan Ualkhanovich Ibraimov	Independent Director of Transtelecom JSC, Chair of the Committee	15 December 2025
2	Nurlan Ulanovich Aryngaziyev	Independent Director of Transtelecom JSC, member of the Committee	15 December 2025
3	Berik Mustayuly Otemurat	Independent Director of Transtelecom JSC, member of the Committee	15 December 2025

The Committee held four meetings during the reporting period, all of them in person. It considered ten items in line with the meeting agendas and issued recommendations to the Company's Board of Directors on each.

The matters considered during the period, all within the Committee's remit, included:

- preliminary review of the report of the Nomination and Remuneration Committee for 2024;
- recommendations on electing members of the Management Board, determining its size, their terms of office and salaries, and on amending the grade and salary structure for administrative, management and operational staff at head office of Transtelecom JSC;
- certain matters relating to the Corporate Secretary of Transtelecom JSC;
- recommendations on approving the scorecards of the Chairman and members of the Management Board of Transtelecom JSC for 2025;
- approval of the internal rules on assessing performance and paying remuneration to members of the Management Board of Transtelecom JSC, and the repeal of the rules on assessing performance and paying remuneration to senior staff of Transtelecom JSC, approved by resolution of the Board of Directors of 28 September 2021 (Minutes No. 7/2021);
- approval of the scorecards of the Chairman and members of the Management Board of Transtelecom JSC for 2025.

Individual attendance at the Committee's meetings during the reporting period was as follows.

Individual attendance at the Committee's meetings during the reporting period was as follows

№	Full name	Meetings held	Meetings attended	Attendance (%)
1	Galymzhan Ualkhanovich Ibraimov	4	4	100
2	Nurlan Ulanovich Aryngaziyev	3	3	100
3	Berik Mustayuly Otemurat	0	0	–
4	Vyacheslav Anatolyevich Anikhovskiy	4	4	100

ACTIVITY OF STRATEGIC PLANNING COMMITTEE IN 2025

The Committee operates in accordance with the Regulations on the Strategic Planning Committee of the Board of Directors of Transtelecom JSC, approved by the Board on 31 August 2016 (Minutes No. 6/2016).

Under the Company's Charter, establishing committees of the Board of Directors, approving their regulations and electing their chairs and members fall within the Board of Directors' remit.

Independent Director of the Company Nurlan Ulanovich Aryngaziyev was elected chair of the Committee, in accordance with the requirements of Kazakhstani law and international corporate governance best practice.

By Board of Directors' resolution dated 6 September 2023 (Minutes No. 6/2023), the Strategic Planning Committee of the Board of Directors of Transtelecom JSC comprised:

- **Galymzhan Ualkhanovich Ibraimov –** member of the Committee – Independent Director.
- **Vyacheslav Anatolyevich Anikhovskiy –** Chair of the Committee – Independent Director;
- **Berik Mustayuly Otemurat –** member of the Committee – Independent Director;
- **Galymzhan Ualkhanovich Ibraimov –** member of the Committee – Independent Director.

By resolution of the Board of Directors of the Company dated 11 March 2025 (Minutes No. 1/2025), the Strategic Planning Committee was reconstituted as follows:

- **Nurlan Ulanovich Aryngaziyev –** Chair of the Committee – Independent Director;
- **Vyacheslav Anatolyevich Anikhovskiy –** member of the Committee – Independent Director;
- **Galymzhan Ualkhanovich Ibraimov –** member of the Committee – Independent Director.

By resolution of the Board of Directors of the Company dated 15 December 2025 (Minutes No. 11/2025), the Strategic Planning Committee was reconstituted as follows:

- **Nurlan Ulanovich Aryngaziyev –** Chair of the Committee – Independent Director;
- **Galymzhan Ualkhanovich Ibraimov –** member of the Committee – Independent Director;
- **Berik Mustayuly Otemurat –** member of the Committee – Independent Director.

As of 31 December 2025, the Strategic Planning Committee of the Board of Directors of Transtelecom JSC therefore comprised:

№	Full name	Position	Date elected
1	Nurlan Ulanovich Aryngaziyev	Independent Director of Transtelecom JSC, Chair of the Committee	15 December 2025
2	Berik Mustayuly Otemurat	Independent Director of Transtelecom JSC, member of the Committee	15 December 2025
3	Galymzhan Ualkhanovich Ibraimov	Independent Director of Transtelecom JSC, member of the Committee	15 December 2025

The Committee held four in-person meetings in 2025, considering and making recommendations on 13 matters.

The matters the Committee considered and made recommendations to the Board of Directors included:

- preliminary review of the report of Strategic Planning Committee of the Board of Directors of Transtelecom JSC for 2024;
- recommendations to the Board of Directors of Transtelecom JSC on the report on budget performance of Transtelecom JSC for 2024;
- recommendations to the Board of Directors of Transtelecom JSC on approving the budget of Transtelecom JSC for 2025;
- preliminary review and approval of amendments to the Charter of Transtelecom JSC, for submission to the General Meeting of Shareholders of Transtelecom JSC;
- recommendations to the Board of Directors of Transtelecom JSC on the report on budget performance of Transtelecom JSC for the first quarter of 2025;
- recommendations to the Board of Directors of Transtelecom JSC on approving the Budget Policy of Transtelecom JSC;
- recommendations to the Board of Directors of Transtelecom JSC on the report on budget performance for the third quarter of 2025;
- recommendations to the Board of Directors of Transtelecom JSC on approving revised budget No. 2 of Transtelecom JSC for 2025;
- recommendations to the Board of Directors of Transtelecom JSC on approving the budget of Transtelecom JSC for 2026, comprising the operating budget, the investment budget and the cash flow budget.

Individual attendance at the Committee's meetings during the reporting period was as follows.

Strategic Planning Committee attendance in 2025

№	Full name	Meetings held	Meetings attended	Attendance (%)
1	Nurlan Ulanovich Aryngaziyev	3	3	100
2	Berik Mustayuly Otemurat	1	1	100
3	Galymzhan Ualkhanovich Ibraimov	4	4	100
4	Vyacheslav Anatolyevich Anikhovskiy	3	3	100

In 2025, the Committees fully discharged the aims, tasks and functions assigned to them under their respective regulations.

During the reporting period, the committees examined every matter on their agendas in full. On each one they produced balanced, well-founded recommendations, which the Company's Board of Directors endorsed and adopted.

The committees' work helped the Board of Directors operate more effectively, ensured that matters were properly worked through, and contributed to the further development of the Company's corporate governance system, fully in line with shareholders' expectations.



Performance Evaluation of the Board of Directors, Its Committees, Individual Members of the Board of Directors, Internal Audit Service and Its Head

No performance evaluation of the Board of Directors of Transtelecom JSC or its committees was carried out in 2025.

The performance of the Head of Internal Audit is assessed under the Rules on Performance Assessment and Remuneration for the Compliance Officer, the Head of Internal Audit and the Head of the Corporate Investigations Service, approved by a Board resolution of 14 March 2022 (Minutes No. 2/2022).

On 16 April 2025 (Minutes No. 2/2025), the Board approved the KPI scorecard with actual results, and the calculation of the remuneration due to the Head of Internal Audit for 2024.

Remuneration of Members of the Board of Directors

In accordance with resolutions of the General Meeting of Shareholders of Transtelecom JSC, Board members receive remuneration while in office and are reimbursed for expenses incurred in performing their duties. Payments in 2025 amounted to KZT 154,863 thousand (2024: KZT 182,712 thousand).

Board members are reimbursed for travel, accommodation and per diem expenses incurred when attending Board of Directors and committee meetings held away from their place of permanent residence.

EXECUTIVE BODY

The Management Board of Transtelecom JSC is the Company's collective executive body, responsible for day-to-day management within the remit set by Kazakhstani law, the Company's Charter, resolutions of the General Meeting of Shareholders and the Board of Directors, and internal documents of Transtelecom JSC.

Composition of the Management Board

The Management Board comprises its Chairman, the Deputy Chairmen and other members elected in the prescribed manner.

Determining the size of the Management Board, the term of office of its members, their election and the early termination of their appointments fall within the exclusive remit of the Company's Board of Directors.

By Board of Directors' resolution dated 16 April 2025 (Minutes No. 2/2025), the Management Board was set at five members with a one-year term of office.

The following were elected:

- Chairman of the Management Board of Transtelecom JSC – Suyenish Tuleukhanovich Abdildin
- Deputy Chairman for Strategic Development and Innovation of the Company – Yerlan Yerikuly Minavar
- Deputy Chairman for Operations of the Company – Sergey Viktorovich Nikitenko
- Deputy Chairman for Economics and Finance of the Company – Abylay Kuatuly Beken
- Deputy Chairman for Network Operations of the Company – Kirill Valeryevich Strashenko.

Remuneration of Management Board Members

Remuneration paid to members of the Management Board during the reporting year (comprising total salaries and all forms of cash incentive) amounted to KZT 194,766 thousand (2024: KZT 47,783 thousand).

VALUES AND BUSINESS ETHICS

Transtelecom JSC upholds the principles of honesty, fairness, integrity, transparency and accountability. Its corporate culture is built on decency, reliability, professionalism, respect and mutual support.

The Company's Code of Business Ethics sets out standards of employee conduct and governs internal relations, social responsibility and corporate governance matters. The Code is binding on all employees and governing bodies of Transtelecom JSC. For contractors and consultants, its provisions are advisory within the scope of their existing obligations.

CONFLICT OF INTEREST

Transtelecom JSC has an approved Corporate Conflict Resolution Policy designed to identify conflicts between shareholders and governing bodies early and resolve them promptly. The Corporate Secretary is responsible for maintaining records and coordinating the process. No conflicts of interest involving the Company's officers or employees were recorded in 2025.

COUNTERING CORRUPTION

Transtelecom JSC regards corruption as a systemic threat to national security. To improve legal awareness and maintain zero tolerance of corruption, the Company follows the principles and priorities set out in the state's anti-corruption policy and observes all applicable requirements of Kazakhstani legislation in this area.

The Company maintains a policy of absolute intolerance towards corruption in any form in its dealings with all stakeholders, and towards the concealment of corruption offences.

Transtelecom JSC rules out all forms of bribery, including offering or receiving money, benefits, or material, physical or other services in return for work, services, actions or omissions favouring those who provided them, where such actions or omissions fall within the powers of the Company's employees. The Company neither offers nor accepts hospitality or gifts that could create obligations on either side. Officers and employees involved in corruption are dismissed and held liable in accordance with Kazakhstani law.

The Company's main anti-corruption objective is to implement effective measures to eliminate and prevent corruption within Transtelecom JSC, and to build a culture of corporate ethics, high integrity and incorruptibility among employees in the performance of their duties.

Employees of Transtelecom JSC are required to observe and be guided by the following core anti-corruption principles:

- legality;
- priority given to protecting the rights, freedoms and legitimate interests of individuals and citizens;
- openness and transparency;
- systematic and comprehensive use of anti-corruption measures;
- priority given to preventive measures;
- protection and encouragement of those who assist in countering corruption;
- the certainty of punishment for corruption offences;
- helping employees of Transtelecom JSC develop a legal culture that rejects fraud and corruption and upholds honesty and incorruptibility in the performance of their duties;
- anti-corruption awareness work;
- cooperation on anti-corruption matters with government authorities and with the partners and counterparties of Transtelecom JSC.

THE MAIN ANTI-CORRUPTION TASKS OF TRANSTELECOM JSC ARE:

1. **involving all employees of Transtelecom JSC in measures to counter fraud and corruption, fostering an atmosphere that supports ethical business conduct and creating intolerance of fraud and corruption;**
2. **building a legal culture among employees of Transtelecom JSC that upholds honesty and transparency in the performance of their duties, by:**

- giving employees and clients or counterparties of Transtelecom JSC a shared understanding that corrupt acts in any form are unacceptable;
- minimising the risk of Transtelecom JSC or its employees becoming involved in corrupt activity, regardless of position, length of service, status or other relationship with the Company;
- eliminating the factors that give rise to corruption;
- building a corporate culture of absolute intolerance towards fraud, misappropriation and embezzlement, with disciplinary measures for managers and employees found to have committed fraud;

3. **preventing fraud and corruption risks when entering into contracts with clients and counterparties, through due diligence checks designed to reduce the likelihood of external fraud and corruption.**

Since 2016, Transtelecom JSC has operated a confidential reporting line supported by an information system, and has also opened a TTC Smart Bot channel on Telegram. Employees and business partners use these channels, either in their own name or anonymously, to report possible corruption or fraud and irregularities in financial, accounting and HR matters. Reporters may submit information confidentially and anonymously, and confidentiality and anonymity are guaranteed. All substantiated reports of breaches received through the line are reported to the Company's management immediately and acted upon.

In recruitment and internal transfers, the Company monitors the openness and transparency of competitive selection procedures for vacancies, in accordance with the applicable regulations. The results of competitive selection are published on the Company's official website.

In its day-to-day operations, Transtelecom JSC complies with anti-corruption legislation and works to counter corruption in all its forms without compromise, as well as to manage corruption risks.

No reports of corrupt conduct by employees were received in 2025.

COUNTERING TERRORIST THREATS

In accordance with the Law of the Republic of Kazakhstan "On Countering Terrorism", Transtelecom JSC carries out targeted counter-terrorism measures.

Organisational measures:

- Counter-terrorism protection was arranged for the administrative building of the Zhambyltranstelecom branch at 1 Bekbosynov Street, Shu, pursuant to Inspection Report No. 31 of 28 November 2025 issued by the Shu District Police Department.
- Counter-terrorism protection was arranged for the administrative building of the Shymkenttranstelecom branch at 1/4 Kabanbay Batyr Street, Shymkent, pursuant to Inspection Report No. 47 of 18 June 2025 issued by the Shymkent City Police Department.

Under the Law of the Republic of Kazakhstan "On Religious Activity and Religious Associations," the Company carries out regular awareness work to promote religious tolerance and mutual respect and to prevent religious extremism.

Access control, security and preventive measures

In 2025, a contractor provided protection for the life, health and property of individuals, and for the property of Transtelecom JSC, against unlawful interference. Security arrangements covered 25 sites of Transtelecom JSC, with 28 guard posts.

In 2025, an additional round-the-clock guard post was set up at a site of the Karagandatranstelecom branch (31 Kyzdarbekov Street, Akadyr settlement).

Technical measures

To maintain security at the sites of Transtelecom JSC, the following are in place:

- access control and management systems at sites of Transtelecom JSC, with electronic access cards issued to new employees;
- round-the-clock and daytime physical security posts at sites of Transtelecom JSC;
- monthly checks of the perimeter fencing of administrative buildings, grounds and line and cable facilities for foreign objects;
- modern engineering and technical security equipment, access control systems and video surveillance at Company sites;
- approved counter-terrorism protection passports for administrative buildings;
- regularly revised and updated notification schemes and call lists in the event of a terrorist threat or attack on Company sites.

To support its security arrangements, Transtelecom JSC carries out the following:

- continuous maintenance of night-time site lighting;
- monthly checks that security alarms are working;
- quarterly inspection and maintenance of personal protective equipment held at branches of Transtelecom JSC;
- monthly inspections of basements, attics and the grounds surrounding branch premises of Transtelecom JSC;
- periodic inspection of line communication facilities for foreign objects.

Civil defence

Transtelecom JSC works continuously on civil protection and civil defence measures.

In 2025, Transtelecom JSC organised and held a command post exercise in Astana on responding to emergencies (21 February 2025).

Work continues on keeping the internal regulations of Transtelecom JSC up to date.

Fourteen employees (managing directors, branch operations directors and members of the head office civil defence staff) were trained on civil defence courses.

RISK MANAGEMENT

Transtelecom JSC recognises the importance of risk management as a key component of its corporate governance system, aimed at identifying risks promptly and taking measures to reduce those that could adversely affect the value and reputation of Transtelecom JSC. Risk management is an integral part of the strategic planning and corporate governance of Transtelecom JSC, and of maintaining its financial stability. Transtelecom JSC has integrated its enterprise risk management system (ERM) into its key business and management processes, and the ERM Policy applies to all of the Company's activities.

For the ERM system to work effectively, Transtelecom JSC follows five interrelated components at every level of its activities, aligned with the business life cycle:

1. **governance and culture;**
2. **strategy and objective setting;**
3. **performance;**
4. **review and revision;**
5. **information, communication and reporting.**

ERM components and principles

1. **Control environment**
- Organisational structure
- Integrity and ethical standards
- Management philosophy and style
- HR policy
- Employee competence, which overlaps with the governance and culture component

2. **Risk assessment**
- Risk identification and analysis (closely linked to the performance component)

3. **Control activities**
- Procedures and policies (part of risk management)

4. **Information and communication**
- Internal and external communication on internal control

5. **Monitoring**
- Monitoring, reporting and implementing changes
- Closely linked to the information, communication and reporting component

Introducing and improving the ERM system is essential if Transtelecom JSC is to achieve its strategic and operational goals. It also involves establishing and developing the necessary infrastructure and culture, and applying logical, systematic methods to identify, analyse, assess, monitor, control and manage the risks inherent in all of the activities, functions and processes of Transtelecom JSC, so as to prevent losses and maximise benefits.

ERM objectives

The primary objective of the ERM system is to manage threats and opportunities more effectively, which should in turn support growth in the Company's capitalisation. The system also has the following objectives:

1. developing and applying uniform, consistent approaches to identifying, assessing and managing risks in Transtelecom JSC, and simplifying the exchange of risk information vertically (management) and horizontally (sharing experience);
2. enabling Transtelecom JSC to set and track the quality of its risk management against clear, well-understood criteria;
3. building an information base for a system of asset accounting, asset market valuation and the valuation of shareholders' equity;
4. responding promptly to risk events as they arise and tracking changes in the external and internal environment;
5. organising targeted risk management activity to reduce risks to an acceptable level or transfer them to third parties (insurance, hedging);
6. systematising and continuing to accumulate information on the risks of Transtelecom JSC, and improving the manageability of the business;
7. ultimately, increasing capitalisation of Transtelecom JSC through more effective and better optimised risk management.

ERM principles

The Board of Directors of Transtelecom JSC oversees the effectiveness of risk management and internal control. Transtelecom JSC's Audit Committee assists the Board of Directors in monitoring the reliability and effectiveness of the ERM and internal control systems.

The Management Board of Transtelecom JSC is responsible for establishing and maintaining an effective risk management and internal control system.

To support horizontal communication and the effective implementation of the risk register in Transtelecom JSC, the Company has a Risk Committee, an advisory body to the Management Board of Transtelecom JSC that develops proposals on risk management. In carrying out their functions, the Board of Directors and the Management Board of Transtelecom JSC rely on the Three Lines of Defence model:

Board of Directors / Audit Committee

Executive body

Accountability

First line of defence
(business functions)

Second line of defence:
monitoring functions

Third line of defence:
independent functions

Business units, through each employee acting within their own remit. Employees (risk owners) manage risks directly and carry out control procedures within their remit in the course of their duties.

Business units, including the risk function, which monitor the activities of the first line of defence and the key risks, and which support and track the implementation of effective risk management and internal control practices and compliance with legislation, administrative rules and internal regulations. The second line of defence monitors, reviews, assesses and examines the work of the first line of defence.

The Internal Audit Service, which independently assesses the effectiveness of risk management and internal control, helps improve them, and provides an independent assessment of how well the risk management and internal control system is working.

ERM approach

Effective risk management requires a continuous, cyclical process consisting of the following five steps:



① SETTING BUSINESS OBJECTIVES AND IDENTIFYING RISKS

Transtelecom JSC sets its business objectives taking account of the strategic and inherent risks it faces. It considers the potential effect of the business context on its risk profile, along with the possible ways of reducing the risks to which it is exposed.

② ASSESSING RISK MATERIALITY

Risks are assessed in order to single out those most likely to have an adverse effect on the operations of Transtelecom JSC and on the achievement of its strategic goals and objectives. The results of the assessment determine the choice of risk response.

③ PRIORITISING RISKS

Risks are prioritised according to their position on the risk map (critical, major, moderate and low). Alongside the assessment results, prioritisation may also take into account the ability of Transtelecom JSC to adapt and respond to a risk, interdependencies between risks that make them harder to manage, the speed at which a risk affects the activity of Transtelecom JSC, how long its adverse consequences persist, etc.

④ RESPONDING TO RISKS

Transtelecom JSC determines its risk response strategies in light of operating conditions, the balance of costs and benefits, its obligations and expectations, risk prioritisation and risk appetite (accepting the risk, avoiding it, deliberately increasing it, reducing it and transferring it).

⑤ REVIEWING RISK AND PERFORMANCE

Risk and performance review is embedded in the Company's activities. Transtelecom JSC reviews its results, including by individual business line, in light of risk: which risks affected performance, how effectively those risks were previously assessed and response measures identified, and how effectively those measures were carried out.

RISK APPETITE

Transtelecom JSC has developed and approved its risk appetite for 2025. Risk appetite defines the level of risk Transtelecom JSC is prepared to retain while still achieving its strategic and operational goals, and sets the upper limit of critical risks/risk factors that it is willing to accept. Alongside quantitative risk appetite measures, Transtelecom JSC also applies qualitative ones.

Risk management in 2025

Transtelecom JSC continually improves its ERM system and regularly updates its risk management policies and methodology, reflecting its commitment to developing the system further.

To make corporate risk management more effective, build risk culture and adopt best practice, Transtelecom JSC carried out a number of key activities in 2025:

1. A risk register for 2025 was compiled, with revised key risk indicators and measures to prevent risks from materialising.
2. Quarterly risk management reports were prepared for the executive body and the Board of Directors, describing and analysing critical risks and reporting on the implementation of risk mitigation plans.

Key risks of Transtelecom JSC

LIQUIDITY RISK

The risk that Transtelecom JSC is unable to meet its obligations in full and on time, or that arises from an imbalance between its financial assets and liabilities.

The current ratio stood at 1.26 as of 31 December 2025, compared with 1.77 as of 31 December 2024. The decline was due to a large cash outflow: Transtelecom JSC repaid financial liabilities early and partly settled accounts payable to a major counterparty. The following measures were taken in 2025 to reduce liquidity risk:

- cutting unjustified expenditure (the purchase of equipment not suitable for the projects concerned);
- sending notices of outstanding receivables to clients promptly and confirming receipt;
- reducing overdue receivables by issuing formal demands and applying the penalties provided in the relevant contracts;
- monitoring compliance with the terms of credit agreements with second-tier banks.

RISK OF BREACHING BANK AND FINANCIAL INSTITUTION REQUIREMENTS BY TRANSTELECOM JSC

As of 31 December 2025, there were no breaches of financial or non-financial covenants. Measures taken to reduce the likelihood of this risk:

- continuous monitoring of credit agreements for compliance with financial and non-financial covenants;
- full early settlement of obligations;
- cutting unjustified expenditure;
- working with counterparties to secure the settlement of obligations and overdue receivables.

CURRENCY RISK ON TEMPORARILY AVAILABLE CASH

The risk of losses from movements in foreign exchange rates against the tenge in the course of the operations of Transtelecom JSC. The risk arises from the revaluation of the Transtelecom JSC's currency position in value terms.

Because it settles some transactions in foreign currency, the Company is exposed to currency risk. As of 31 December 2025, its net currency position across all currencies was KZT 1,277 million. This included negative positions of KZT 1,147 million in Russian roubles (a long-term expenditure contract indexed to the rouble rate), KZT 5 million in pounds sterling and KZT 70 million in euros (both expenditure contracts). The value-at-risk assessment (annual figure) showed the potential loss falling from KZT 2,637 million at the start of the year to KZT 942 million.

Measures taken to reduce this risk:

- monitoring exchange rates;
- diversifying the currency position.

WORKPLACE INJURY

Failure by employees to observe health and safety rules, and breaches of operational discipline, create a threat to life and a risk of harm to employees' health. There were no workplace injuries to Transtelecom JSC employees in 2025. Measures taken to reduce the likelihood of this risk:

- provision of improved safety harnesses, and the purchase of wooden poles to renew (replace) defective ones under the branch-by-branch pole and reinforced-concrete stub replacement programme;
- employees are not permitted to carry out high-risk work without a written work permit;
- thorough, systematic training of health and safety engineers in safe working methods;
- supervision of high-risk work by health and safety engineers at the work site;
- checks before work begins that the necessary personal protective equipment, fittings are available, and preparation of work sites, etc.;
- health and safety instructions provided in both Kazakh and Russian.

RISK OF RISING OVERDUE RECEIVABLES (MORE THAN THREE MONTHS)

The risk of income not received for services already provided to the customers and clients of Transtelecom JSC.

As of 31 December 2025, overdue receivables of more than three months stood at KZT 4,971 million, compared with KZT 7,327 million as of 31 December 2024.

Measures taken to reduce the likelihood of this risk:

- signing completion certificates promptly;

- continuous monitoring and reminder calls to clients from the date the receivable arises, in line with the terms of the contract;
- sending notices of outstanding receivables promptly and confirming receipt;
- timely monitoring of existing receivables for missed payment deadlines;
- issuing invoices promptly and accurately.

Further adoption of risk management best practice and standards

Given the new realities in risk management and internal control, the Company has set the following priorities to develop its ERM system in line with international standards and corporate governance criteria, reduce the risks that could prevent it from meeting its goals, and capture opportunities for further growth:

1. Delivering the action plan for improving corporate governance in relation to ERM, in accordance with the Long-Term ERM Strategic Plan.
2. Updating the internal ERM regulations and the organisation of the risk management process.
3. Developing the risk management and internal control systems and integrating them with strategic planning, financial and investment activity, operations and business decision-making.
4. Assessing, developing and raising the level of risk culture.
5. Cross-functional cooperation on risk management across strategic development, project management, information security and sustainable development.

INTERNAL AUDIT SERVICE

The Internal Audit Service (hereinafter referred to as the IAS) of Transtelecom JSC reports to the Board of Directors and is accountable to it, with its work overseen by the Audit Committee. The appointment, dismissal and remuneration of Internal Audit Service staff are approved by the Board of Directors.

MISSION AND OBJECTIVES:

The Internal Audit Service supports the Board of Directors and the Management Board in achieving the Company's strategic goals by providing independent assurance and advice on internal control, risk management and corporate governance.

THE IAS' ACCOUNTABILITY TO THE BOARD OF DIRECTORS IS ENSURED THROUGH:

- approval of all key regulations and plans;
- review of its reports and of any constraints on its work;
- the Audit Committee's involvement in all key matters.

ORGANISATION OF WORK:

- Work is carried out under a risk-based annual plan approved by the Board of Directors.
- The Regulations on the IAS are based on international professional standards and adapted to the business of Transtelecom JSC.
- Reports on the implementation of the audit plan are provided quarterly.

The IAS regularly assesses the effectiveness of the internal control and risk management systems, taking international best practice into account.

INFORMATION SECURITY

In 2025, the Company approved an Information Security Policy and Rules for Determining the Applicability of Information Security Measures (Minutes of the Management Board meeting of Transtelecom JSC No. 15/2025 of 25 September 2025).

An internal audit of the integrated information security management system was carried out at head office and at the Astanatranstelecom, Pavlodartranstelecom, Kyzylordatranstelecom and Karagandatranstelecom branches.

Under the approved information security awareness programme of Transtelecom JSC, the information security function delivered training for employees on information security and personal data protection.

The Company successfully passed the audit and obtained certification to ST RK ISO/IEC 27001-2023, "Information security, cybersecurity and privacy protection. Information security management systems. Requirements."

To protect information security and clients' personal data, Transtelecom JSC implemented a range of organisational and technical measures in 2025. It approved Rules on the Collection and Processing of Personal Data, appointed an officer responsible for organising personal data processing, and put confidentiality undertakings in place. Modern technical measures are used to protect information, including network segmentation, and access to information systems is governed by a role-based model with approval procedures and segregation of access rights.

Transtelecom JSC collects, uses and stores customer information in accordance with the requirements of Kazakhstani law and its own internal regulations. Personal data is collected only to the extent necessary to provide telecom services, meet contractual obligations and comply with legal requirements. Organisational and technical measures are applied to keep client information confidential and secure.

QUALITY MANAGEMENT

Transtelecom JSC treats the quality of its infocommunication services as a priority and maintains an Integrated Management System (hereinafter referred to as the IMS) based on international and national standards:

ISO 9001, ISO 14001, ISO 45001, ISO 50001, ISO/IEC 20000-1 AND ST RK ISO/IEC 27001.

In 2025, Transtelecom JSC underwent an important external audit, conducted by the independent certification bodies URS Kazakhstan and the Kazakhstan Quality Centre.

The auditors examined how all of the Company's processes are organised, from service quality and data protection to employee safety and environmental performance. The audit was carried out against the following international and national standards:

- **ISO 9001, Quality management systems;**
- **ISO 14001, Environmental management systems;**
- **ISO/IEC 20000-1, IT-service management systems;**
- **ISO 45001, Occupational health and safety management systems;**
- **ISO 50001, Energy management systems;**
- **ISO/IEC 27001-2015, Information security management systems.**

Passing the audit is more than a formality. It confirms that TTC operates transparently, safely and efficiently.

The audit confirmed that TTC meets these demanding requirements, and the Company received two key certificates valid for the next three years:

- **ISO 45001, for providing safe working conditions;**
- **ISO/IEC 27001-2023, for a high standard of information protection.**

THE COMPANY ALSO REMAINS ON THE REGISTER OF CERTIFIED ORGANISATIONS.

TTC has been undergoing audits of this kind since 2005. Every year it confirms its compliance with ISO standards through surveillance and recertification audits. This is an important element of its steady development and leadership in the telecom industry.

Transtelecom JSC

6 APPENDICES

КОМПАНИЯ ПОСЛЕДОВАТЕЛЬНО ПРИМЕНЯЕТ ВЫСОКИЕ СТАНДАРТЫ КОРПОРАТИВНОГО УПРАВЛЕНИЯ И УСТОЙЧИВОГО РАЗВИТИЯ



054 Appendix 1. About report
057 Appendix 2. GRI content figures
060 Appendix 3. Financial Statements
066 Glossary

APPENDIX 1. ABOUT REPORT

About the Company and report format

Transtelecom JSC presents its integrated report for 2025, setting out the key results of the year, information for shareholders, clients, partners and investors, and the Company's development plans.

The Company consistently applies high standards of corporate governance and sustainable development. Since 2015, its annual reports have disclosed not only operational indicators but also environmental, occupational health, industrial and social responsibility matters, with reference to the GRI Standards.

For ease of reading, the report includes links to additional material, including the Company's official website.

Reporting period and scope

The report covers the period from 1 January to 31 December 2025. Comparative figures for 2023 and 2024 are given for context.

Financial data is presented in tenge in accordance with the audited IFRS financial statements as of 31 December 2025, which are available at www.ttc.kz The report is prepared in Russian, Kazakh and English.

Process of determining the report content

Transtelecom JSC aims to report its performance objectively, covering both its achievements and the challenges it faced during the period.

The following principles were applied in preparing the report's content:

- stakeholder engagement;
- sustainability context;
- materiality;
- completeness.

The report covers the topics that matter most to the Company: long-term economic growth, occupational health and environmental protection, and the development of human capital. The information is presented in accessible form, with minimal technical terminology. Diagrams, charts and tables are used for clarity, and all abbreviations are defined.

Material topics were selected using the GRI methodology and involved:

1. Analysing the sustainability context in the telecom industry and relevant best practice.
2. Assessing the impact of the Company's operational processes and business model.
3. Taking stakeholders' views into account.
4. Prioritising topics by significance.

ALL INFORMATION DISCLOSED IN THIS REPORT IS ACCURATE AND VERIFIABLE.

Stakeholder engagement

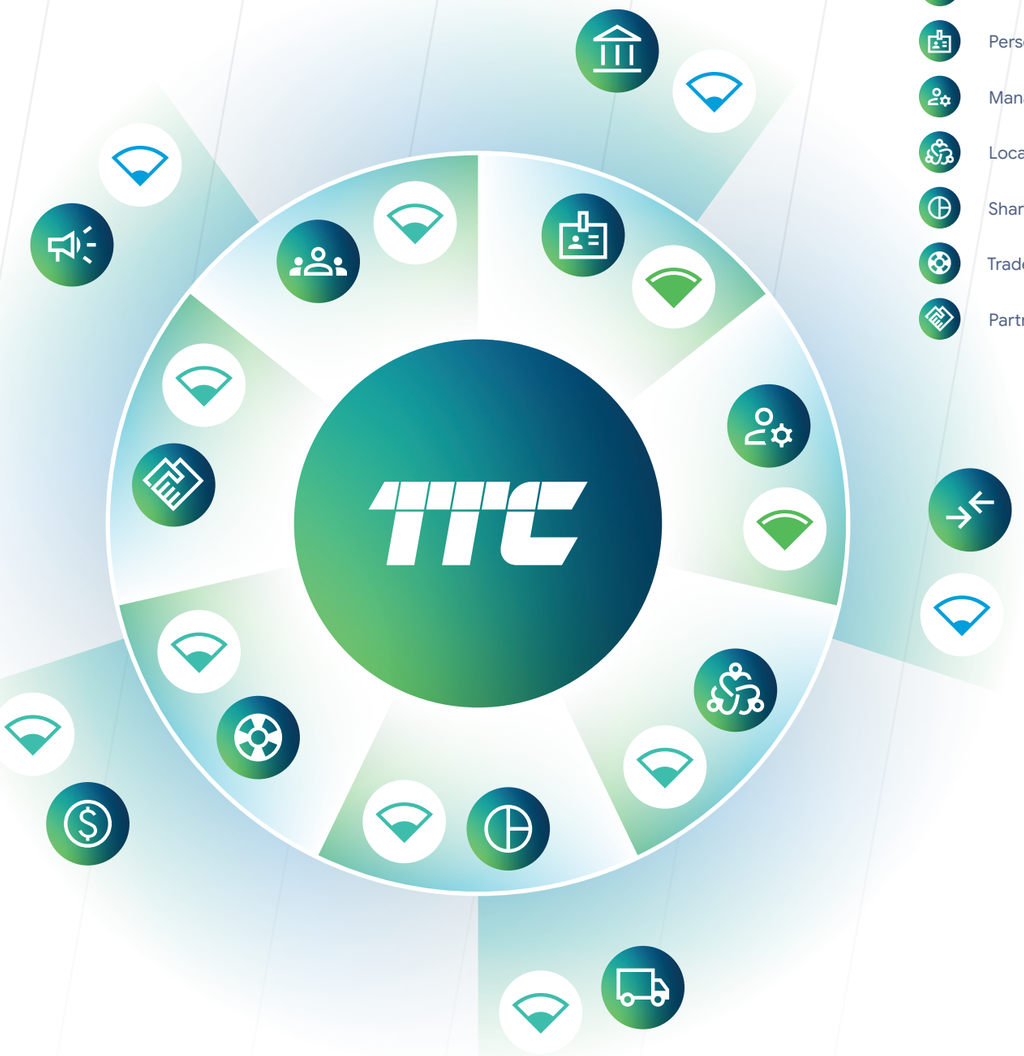
Transtelecom JSC follows the principle of active stakeholder engagement, maintaining a high level of openness and transparency. The Company builds sustained communication, providing material information promptly and taking account of the enquiries and expectations it receives.

APPROACH OF TRANSTELECOM JSC TO STAKEHOLDER ENGAGEMENT

Stakeholder engagement is one of the key conditions for sustainable development and for creating long-term value for Transtelecom JSC. Constructive relationships with internal and external stakeholders help the Company achieve its strategic goals, improve its resilience to reputational and operational risks, and gain a deeper understanding of the business environment and social expectations.

Transtelecom JSC seeks to take stakeholders' views into account and to adapt its business practices to current needs in social responsibility, the environment and charitable activity. Its engagement rests on the principles of openness, respect, trust and mutually beneficial cooperation.

The approach is set out in the Company's corporate documents, the Code of Corporate Ethics and the Corporate Governance Code, which are designed to protect stakeholders' rights and reconcile their interests.



- Clients
- Personnel
- Management
- Local communities
- Shareholders
- Trade union
- Partners
- Competitors
- Suppliers
- Investors
- Media
- Government bodies

Transtelecom JSC classifies stakeholders into three categories by degree of influence:

Sphere of authority and responsibility: stakeholders directly subordinate to and managed by the Company, such as employees and subsidiaries.

Sphere of direct influence: groups and organisations the Company affects directly through its operations (such as clients, suppliers and shareholders).

Sphere of indirect influence: external stakeholders with whom the Company interacts through the regulatory, reputational or public arena, such as government authorities, the media and local communities.

Transtelecom JSC engages with stakeholders on the basis of openness, respect and mutual benefit. The Company considers it important to maintain continuous dialogue and to take stakeholders' views into account when making decisions.

Core engagement principles:

- regular and constructive dialogue;
- partnership and mutually beneficial cooperation;
- trust and candour in communication;
- transparency in activity;
- meeting commitments and accepting responsibility.

Key stakeholders:

- shareholders;
- trade union organisations;
- service users and clients;
- suppliers and contractors;
- employees;
- government and regulatory authorities;
- the media;
- local communities.

This approach helps strengthen the business reputation of Transtelecom JSC, build lasting relationships and increase confidence in its work.

SHAREHOLDERS

Transtelecom JSC aims for sustainable growth and an increase in the Company's value in shareholders' interests. It follows the principles of transparency and equal rights and observes corporate governance best practice.

Information for shareholders is available through the annual report, the financial statements and the corporate website. All shareholders have equal access to information about the Company's activities and financial position.

Under the Charter, the Company is managed through the General Meeting of Shareholders, the Board of Directors and the Management Board, which together ensure that shareholders' rights are respected.

Beyond financial results, shareholders also focus on non-financial matters: the quality of corporate governance, relationships with clients and partners, operational safety and the Company's contribution to community development.

EMPLOYEES

Transtelecom JSC builds its relationship with employees on respect, trust and partnership, with an emphasis on developing human capital.

Pay, social guarantees, working conditions and career development opportunities meet legal requirements and are set out in employment contracts. The Company encourages initiative, responsibility and a drive for strong results, creating the conditions for professional growth and greater effectiveness.

SUPPLIERS AND CUSTOMERS

Transtelecom JSC aims for sustainable, long-term partnerships, observing the principles of transparency, fair competition and its anti-corruption policy. The Company meets its obligations on time, maintains open dialogue and provides suppliers and customers with the information they need. Service quality is monitored in accordance with state and corporate standards.

GOVERNMENT AUTHORITIES

Transtelecom JSC maintains responsible, good-faith relations with government bodies and takes part in working groups on improving legislation. The Company does not support political parties or political figures; its contribution to the country's development is made through charitable and sponsorship initiatives.

LOCAL COMMUNITIES

Transtelecom JSC works with local communities, delivering projects in education, healthcare, employment, infrastructure and local amenities. These initiatives help improve quality of life and foster a positive atmosphere in the regions where the Company operates.

THE MEDIA

Transtelecom JSC ensures transparency and maintains constructive dialogue with the media, holding press conferences and publishing material regularly in national outlets.

The main channel for information is the Company's official website, www.ttc.kz, particularly the "About the Company" section, which carries news, reports, performance indicators and documents of the governing bodies. All information is available in Russian, Kazakh and English.

Assurance

The sustainability information in this report has not been externally assured.

FORWARD-LOOKING STATEMENTS

Some of the information in this report is forward-looking. Such statements are indicated by words like "expects," "intends" and "estimates," and by figures marked "plan."

Actual results may differ materially from the expectations stated. Forward-looking statements are valid only as at the date of publication and are not a guarantee of future results.

APPENDIX 2. GRI CONTENT FIGURES

Statement of use:
Transtelecom JSC has prepared this report in accordance with the GRI Standards for 2025

GRI 1 used:
GRI 1: Foundation 2021
Applicable sector standard:
Not applicable

GRI standard	Disclosure	Section	Omission: Indicator	Omission: Reason	Omission: Explanation	No. in sector standard
General disclosures						
GRI 2 General disclosures 2021	2-1 Organisational profile	Company profile				
	2-2 Entities included in the report	Company profile				
	2-3 Reporting period	About report				
	2-4 Changes in reporting	About report				
	2-5 External assurance	About report				
	2-6 Activities, value chain, and other relationships	Business Model				
	2-7 Employees	Workforce Composition				
	2-8 Independent workers	Workforce Composition				
	2-9 Governance structure and composition	Company's Governance Structure				
	2-10 Nomination and selection of the highest govern-ance body	Board of Directors' activity				
	2-11 Chair of the highest governance body	Composition of the Board of Directors				
	2-12 Role of the highest governance body in over-seeing the organisation's impacts	Sustainable Development				
	2-13 Delegation of responsibility for sustainability	Sustainable Development				
	2-14 Role of the highest governance body in sustain-ability reporting	Sustainable Development				
	2-15 Conflicts of interest	Conflicts of Interest settlement				
	2-16 Communication and grievances	Complaints and Enquiries				
	2-17 Competence development of the highest govern-ance body regarding sustainability	Board of Directors' activity				
	2-18 Evaluation of the highest governance body	Performance Evaluation of the Board of Directors, Its Committees, Individual Members of the Board of Directors, the Management Board, the Internal Audit Service and Its Head				
	2-19 Remuneration policy	Remuneration of Board of Directors' Members; Remuneration of Management Board Members				
	2-20 Process for determining remuneration	Remuneration of Management Board Members				

	2-21 Remuneration ratios	Remuneration of Management Board Members				
	2-22 Statement on sustainable development strategy	Sustainable Development				
	2-23 Policy on responsible busi-ness practices	Values and Business Ethics				
	2-24 Policy implementation	Values and Business Ethics				
	2-25 Processes to remediate negative impacts	Risk Management				
	2-26 Mechanisms for advice and raising concerns regarding business practices	-		Not applicable	The Company does not currently have mechanisms for raising concerns	
	2-27 Compliance with laws and regulations	Regulatory Environment				
	2-28 Membership in associations	Participation in Charters and Associations				
	2-29 Approach to stakeholder engagement	Stakeholder Engagement				
	2-30 Collective bargaining agreements	Social Policy				
Material topics						
GRI 3 Material topics 2021	3-1 Process to determine material topics	About report				
	3-2 List of material topics	About report				
Economic performance						
GRI 3 Material topics 2021	3-3 Management of material topics	Sustainable Development				
GRI 201 Economic performance 2016	201-1 Direct economic value generated and distributed	Sustainable Development				
Procurement practices						
GRI 3 Material topics 2021	3-3 Management of material topics	Procurement				
GRI 204 Procurement practices 2016	204-1 Proportion of spending on local suppli-ers	Procurement				
Countering corruption						
GRI 3 Material topics 2021	3-3 Management of material topics	Countering corruption				
GRI 205 Countering corruption 2016	205-1 Operations assessed for risks related to corruption	Countering corruption				
	205-2 Communication and training about anti-corruption policies and procedures	Countering corruption				
	205-3 Confirmed incidents of corruption	Countering corruption				
Energy						
GRI 3 Material topics 2021	3-3 Management of material topics			Not applicable		
GRI 302 Energy 2016	302-1 Energy consumption within the organisation			Not applicable		
	302-4 Reduction of energy consumption			Not applicable		

Emissions						
GRI 3 Material topics 2021	3-3 Management of material topics	Environmental protection				
GRI 305 Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Environmental protection				
	305-7 Other significant air emissions	Environmental protection				
Employment						
GRI 3 Material topics 2021	3-3 Management of material topics	Workforce composition				
GRI 401 Employment 2016	401-1 New employee hires and employee turnover	Workforce composition				
	401-3 Parental leave	Social policy				
Occupational health and safety						
GRI 3 Material topics 2021	3-3 Management of material topics	Health and safety				
GRI 403 Occupational safety 2018	403-1 Occupational health and safety management system	Health and safety				
	403-2: Hazard identification, risk assessment, and incident investigation	Health and safety				
	403-3: Occupational health services	Health and safety				
	403-4: Worker participation, consultation, and communication on occupational health and safety	Health and safety				
	403-5: Worker training on occupational health and safety	Health and safety				
	403-6: Promotion of worker health	Health and safety				
	403-7: Prevention and mitigation of occupational health and safety impacts	Health and safety				
	403-9: Work-related injuries	Health and safety				
Training and education						
GRI 3 Material topics 2021	3-3 Management of material topics	Training and Development				
GRI 404 Training and education 2016	404-1 Average hours of training per year per employee	Training and Development				
	404-2 Programs for advanced training	Training and Development				
	404-3 Percentage of employees receiving regular performance and career development reviews	Training and Development				
Equal career opportunities						
GRI 3 Material topics 2021	3-3 Management of material topics	Workforce Composition				
GRI 405 Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Workforce Composition				
	405-2 Ratio of basic salary and remuneration of women to men	Workforce Composition				

Industry material topics deemed not material for the Company	**Not applicable**

APPENDIX 3. FINANCIAL STATEMENTS

for the year ended 31 December 2025, with the Independent Auditor's Report

STATEMENT OF MANAGEMENT'S RESPONSIBILITY FOR THE PREPARATION AND APPROVAL OF THE CONSOLIDATED FINANCIAL STATEMENTS

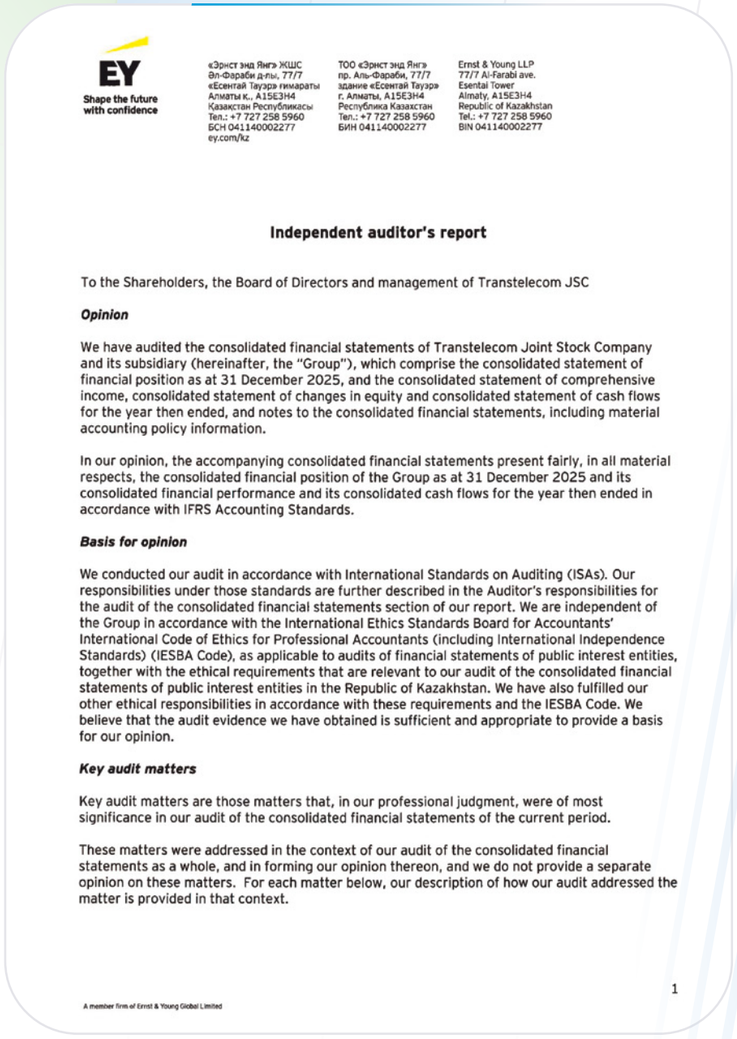
Management is responsible for the preparation of the consolidated financial statements of JSC Transtelecom and its subsidiary (hereinafter collectively referred to as the "Group"), which fairly present the financial position of the Group as at 31 December 2025, and its financial performance, cash flows and changes in equity for the year then ended, in accordance with International Financial Reporting Standards ("IFRS").

When preparing the consolidated financial statements, management is responsible for:

- Properly selecting and applying accounting policies;
- Presenting information, including accounting policies, in a manner that provides relevant, reliable, comparable and understandable information;
- Providing additional disclosures when compliance with the specific requirements in IFRSs is insufficient to enable users to understand the impact of particular transactions, other events and conditions on the Group's financial position and financial performance;
- Making an assessment of the Group's ability to continue as a going concern.

Management is also responsible for:

- Designing, implementing and maintaining an effective and sound system of internal controls throughout the Group;
- Maintaining adequate accounting records that are sufficient to show and explain the Group's transactions and disclose with reasonable accuracy at any time the financial position of the Group, and which enable them to ensure that the consolidated financial statements of the Group comply with IFRSs;
- Maintaining accounting records in compliance with IFRSs and legislation of the Republic of Kazakhstan;
- Taking such steps as are reasonably available to them to safeguard the assets of the Group;
- Detecting and preventing fraud and other irregularities.



EY
Shape the future with confidence

«Эрнст энд Янг» ЖШС
Әл-Фараби д-лы, 77/7
«Есентай Тауэрз» ғимараты
Алматы қ., А15Е3Н4
Қазақстан Республикасы
Тел.: +7 727 258 5960
БСН 041140002277
ey.com/kz

ТОО «Эрнст энд Янг»
пр. Аль-Фараби, 77/7
здание «Есентай Тауэр»
г. Алматы, А15Е3Н4
Республика Казахстан
Тел.: +7 727 258 5960
БИН 041140002277

Ernst & Young LLP
77/7 Al-Farabi ave.
Esental Tower
Almaty, A15E3H4
Republic of Kazakhstan
Tel.: +7 727 258 5960
BIN 041140002277

Independent auditor's report

To the Shareholders, the Board of Directors and management of Transtelecom JSC

Opinion

We have audited the consolidated financial statements of Transtelecom Joint Stock Company and its subsidiary (hereinafter, the "Group"), which comprise the consolidated statement of financial position as at 31 December 2025, and the consolidated statement of comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including material accounting policy information.

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2025 and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with IFRS Accounting Standards.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the consolidated financial statements section of our report. We are independent of the Group in accordance with the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), as applicable to audits of financial statements of public interest entities, together with the ethical requirements that are relevant to our audit of the consolidated financial statements of public interest entities in the Republic of Kazakhstan. We have also fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period.

These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. For each matter below, our description of how our audit addressed the matter is provided in that context.

1

A member firm of Ernst & Young Global Limited

Shape the future with confidence

We have fulfilled the responsibilities described in the Auditor's responsibilities for the audit of the consolidated financial statements section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the consolidated financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying consolidated financial statements.

Key audit matter	*How the key matter was addressed in our audit*
Revenue from contracts with customers	
As disclosed in *Note 3*, the Group generates revenue from various sources, including telecommunications services, IT services and construction and installation services. Revenue is recognised when the Group satisfies a performance obligation under a contract. Due to the large number and diversity of contractual arrangements, as well as the various pricing components, the recognition of revenue requires significant management judgement. Revenue from telecommunications services is generated through a large number of individually immaterial transactions, the information for which is obtained from multiple systems, including the billing system. The processing and accounting for such revenue is automated and is based on established tariff plans.	We obtained an understanding of the process for recognising the various types of revenue arising from contracts with customers. We evaluated the accounting policies relating to revenue recognition selected and applied by the Group. We agreed the service periods and amounts stated in the supporting documentation to the revenue recognised in the primary accounting system. We performed analytical procedures by comparing the monthly revenue from telecommunications and IT services for the current year with the corresponding monthly revenue for the prior year and investigated unusual trends in revenue recognition. For revenue from telecommunications and IT services, with the involvement of our IT specialists, we reviewed the relevant IT systems and evaluated the design of the related general IT controls, and tested their operating effectiveness for the billing and accounting systems.

A member firm of Ernst & Young Global Limited

Shape the future with confidence

In addition, the Group recognises revenue from construction and installation services based on the measurement of progress towards complete satisfaction of the performance obligation. To determine the stage of completion, management applies an input method, which involves forecasting the total revenue and costs to complete the long-term project and allocating the total contract revenue amount to the performance obligations.

Accordingly, due to the complexity of the information systems involved in the revenue accounting process and the risks associated with the incorrect recognition and measurement of revenue, we determined this matter to be one of the most significant matters in our audit.

Disclosures relating to the accounting policies for revenue recognition from contracts with customers and the assumptions applied by management are included in *Note 3* and *Note 4* to the consolidated financial statements, respectively, while disclosures relating to the categories of revenue are included in *Note 22* to the consolidated financial statements.

For revenue from telecommunications and IT services, we tested the IT controls over the processes for calculating amounts to be billed to customers and for recording amounts received from customers.

We tested controls over the transfer of data between the relevant IT systems used in accounting for revenue from telecommunications and IT services.

We reviewed documentation evidencing the authorisation of tariff changes implemented in the automated billing system.

We tested the transfer of data from the billing system to the accounting system by reconciling information extracted from both systems.

On a sample basis, we tested revenue from telecommunications and IT services recognised immediately before and after the year end to assess whether such revenue had been recognised in the appropriate reporting period.

For revenue from construction and installation services, we evaluated management's assumptions used in estimating the costs to complete projects, the percentage of completion of projects, comparisons of budgeted and actual results for both revenue and costs, and provisions for expected losses on onerous contracts. We examined the terms of key contracts and the costs incurred to assess the stage of completion of long-term projects.

We evaluated the adequacy of the disclosures relating to revenue from contracts with customers in the consolidated financial statements.

A member firm of Ernst & Young Global Limited

Shape the future with confidence

Business combination

In January 2025, the Group acquired a 100% equity interest in Railverse LLP.

The Group performed a fair value assessment of the net assets of Railverse LLP as of the acquisition date. The measurement of fair value is significant to the consolidated financial statements and requires management to exercise significant professional judgement. Accordingly, we determined this matter to be one of the most significant matters in our audit.

Disclosures relating to the accounting policies for business combinations and the assumptions applied by management are included in *Note 3* and *Note 4* to the consolidated financial statements, respectively, while disclosures relating to the business combination are included in *Note 5* to the consolidated financial statements.

We examined the share purchase agreement and the constituent documents.

We evaluated management's assessment of control over the acquired equity interest and the accounting treatment of the acquisition in the Group's consolidated financial statements.

We involved our internal valuation specialists to assess the methodology used by management to measure the fair value of property, plant and equipment and intangible assets and evaluated the key assumptions and judgements applied by management, including the reasonableness of the discount rate used.

We tested the mathematical accuracy of the future cash flow model used by management to determine the fair value of the intangible assets.

We also evaluated the adequacy of the related business combination disclosures in the consolidated financial statements.

Emphasis of matter

We draw attention to *Note 28* to the consolidated financial statements, which describes the significant volume of transactions between the Group and related parties. Our opinion is not modified in respect of this matter.

Other information included in the Group's 2025 Annual Report

Other information consists of the information included in the Group's 2025 Annual Report, other than the consolidated financial statements and our auditor's report thereon. Management is responsible for the other information. The Group's annual report for 2025 is expected to be made available to us after the date of this auditor's report.

Our opinion on the consolidated financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information identified above when it becomes available and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

A member firm of Ernst & Young Global Limited

Responsibilities of management and the Audit Committee for the consolidated financial statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with IFRS Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

The Audit Committee is responsible for overseeing the Group's financial reporting process.

Auditor's responsibilities for the audit of the consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

A member firm of Ernst & Young Global Limited

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with the Audit Committee regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the Audit Committee with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with the Audit Committee, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

A member firm of Ernst & Young Global Limited

The partner in charge of the audit resulting in this independent auditor's report is Adil Syzdykov.

Ernst & Young LLP

Adil Syzdykov
Auditor

Auditor Qualification Certificate
No. МФ-0000172 dated 23 December 2013

Rustamzhan Satarov
General Director
Ernst & Young LLP

State Audit License for audit activities on the territory of the Republic of Kazakhstan: series МФЮ-2, № 0000003, issued by the Ministry of Finance of the Republic of Kazakhstan on 15 July 2005

A15E3H4, Republic of Kazakhstan, Almaty
Al-Farabi ave., 77/7, Esentai Tower

1 July 2026

A member firm of Ernst & Young Global Limited

Consolidated statement of financial position

AS AT 31 DECEMBER 2025

In thousands of tenge	Note	31 December 2025	31 December 2024
Assets			
Non-current assets			
Property, plant and equipment	6	**69,667,640**	66,304,016
Non-current portion of advances paid	8	**–**	4,222,541
Intangible assets	7	**2,804,780**	3,279,875
Other non-current assets	9	**5,470,738**	277,383
		77,943,158	74,083,815
Current assets			
Inventories	12	**2,083,358**	1,911,619
Trade receivables from related parties	28	**20,868,871**	10,247,950
Trade receivables from third parties	10	**11,980,491**	14,554,152
Contract assets	10	**207,789**	370,050
Income tax prepaid		**855,334**	1,580,534
Other current assets	11	**3,641,406**	7,042,039
Current portion of advances paid	8	**586,391**	931,074
Cash and cash equivalents	13	**5,890,669**	13,575,088
		46,114,309	50,212,506
Total assets		**124,057,467**	124,296,321
Equity and liabilities			
Equity			
Share capital	14	**12,241,487**	12,241,487
Retained earnings		**35,520,657**	41,548,281
		47,762,144	53,789,768
Non-current liabilities			
Loans	15	**8,302,664**	9,000,000
Issued bonds	16	**22,664,439**	22,467,090
Lease liabilities	17	**206,431**	211,859
Employee benefit obligations		**549,675**	700,622
Trade payables	19	**–**	737,808
Liabilities under contracts with customers	18	**1,038,987**	1,199,241
Deferred income tax liabilities	21	**6,966,476**	7,775,578
		39,728,672	42,092,198
Current liabilities			
Loans	15	**3,223,807**	146,250
Issued bonds	16	**659,086**	659,086
Lease liabilities	17	**394,597**	155,173
Employee benefit obligations		**1,213,453**	964,519
Trade payables	19	**21,066,767**	16,387,168
Liabilities under contracts with customers	18	**1,726,838**	1,824,002
Taxes payable and other mandatory payments		**1,113,062**	2,419,789
Other current liabilities	20	**7,169,041**	5,858,368
		36,566,651	28,414,355
Total liabilities		**76,295,323**	70,506,553
Total equity and liabilities		**124,057,467**	124,296,321

Consolidated statement of comprehensive loss

FOR THE YEAR ENDED 31 DECEMBER 2025

In thousands of tenge	Note	2025	2024
Revenue	22	**87,970,700**	88,835,149
Operating lease income	22	**169,185**	132,694
Cost of sales	23	**(74,046,389)**	(69,435,834)
Gross profit		**14,093,496**	19,532,009
General and administrative expenses	24	**(7,177,488)**	(11,044,441)
Profit from core operations		**6,916,008**	8,487,568
Finance income	25	**777,095**	1,896,488
Finance costs	26	**(5,024,278)**	(8,096,989)
Foreign exchange gain/(loss)		**(2,814,525)**	2,524,602
Other income, net	27	**473,872**	18,906,683
Profit before tax		**328,172**	23,718,352
Income tax expense	21	**(513,664)**	(5,373,274)
Loss for the year		**(185,492)**	18,345,078
Other comprehensive income			
Other comprehensive income that will not be reclassified to profit or loss in subsequent periods (net of tax):			
Gain / (loss) on remeasurement of long-term employee benefit plans		**157,868**	(124,170)
Net other comprehensive income/(loss) that will not be reclassified to profit or loss in subsequent periods		**157,868**	(124,170)
Other comprehensive income/(loss) for the year, net of tax		**157,868**	(124,170)
Total comprehensive loss for the year, net of taxes		**(27,624)**	18,220,908

Consolidated statement of changes in equity

FOR THE YEAR ENDED 31 DECEMBER 2025

In thousands of tenge	Share capital	Retained earnings	Total equity
At 1 January 2024	12,241,487	23,327,373	35,568,860
Profit for the year	–	18,345,078	18,345,078
Other comprehensive loss for the year, net of income tax	–	(124,170)	(124,170)
Total comprehensive income for the year	–	18,220,908	18,220,908
As at 31 December 2024	**12,241,487**	**41,548,281**	**53,789,768**
Loss for the year	**–**	**(185,492)**	**(185,492)**
Other comprehensive income for the year, net of income tax	**–**	**157,868**	**157,868**
Total comprehensive loss for the year	**–**	**(27,624)**	**(27,624)**
Dividends (Note 14)	–	(6,000,000)	(6,000,000)
At 31 December 2025	**12,241,487**	**35,520,657**	**47,762,144**

Consolidated statement of cash flows

FOR THE YEAR ENDED 31 DECEMBER 2025

In thousands of tenge	Note	2025	2024
Cash flows from operating activities			
Profit before tax		**328,172**	23,718,352
Adjustments for:			
Amortisation	23,24	**12,190,558**	13,551,612
Finance costs	26	**5,024,278**	8,096,989
Finance income	25	**(777,095)**	(1,896,488)
Write-off / (reversal) of provision for impairment of inventories	24	**1,793**	(76,173)
Accrual of provision for impairment of advances paid, other current and non-current assets	24	**95,455**	1,003,427
Gain on disposal of property, plant and equipment and intangible assets		**–**	(18,108,723)
Employee benefit obligations		**107,192**	93,967
Foreign exchange (gain)/loss		**2,814,525**	(2,524,602)
Accrual of provision for impairment of property, plant and equipment		**29,554**	–
(Reversal)/accrual of provision for expected credit losses on accounts receivable	24	**(1,441,045)**	2,573,218
Accrual/ (reversal) of provisions	20	**1,111,285**	(3,207,255)
Accrual of provision for remuneration to management	24	**228,839**	874,018
Accrual of provision for unused vacations		**466,729**	–
(Reversal)/accrual of provision for expected credit losses on cash and cash equivalents	13	**(72,585)**	65,295
Gain from bargain purchase	5	**(10,689)**	–
Cash flows from operating activities before changes in working capital		**20,096,966**	**24,163,637**
Working capital changes			
Change in trade receivables		**(7,011,421)**	(6,445,790)
Change in inventories		**(32,548)**	5,267,230
Change in advances paid		**345,938**	(71,687)
Change in other current assets		**2,882,414**	(2,518,170)
Change in trade payables		**6,585,735**	2,666,473
Change in taxes payable and other mandatory payments		**62,487**	(11,404,940)
Change in liabilities under contracts with customers		**(95,867)**	(6,638,690)
Change in other current and non-current liabilities		**(463,713)**	3,014,791
Change in employee benefit obligations		**(89,671)**	(84,286)
Cash flows from operating activities		**22,280,320**	**7,948,568**
Interest received		**426,822**	971,768
Interest paid on loans	29	**(1,586,352)**	(29,948)
Interest paid on lease liabilities	29	**(38,120)**	(110,226)
Coupon interest paid on bonds	29	**(2,870,007)**	(2,870,006)
Income tax paid		**(3,317,452)**	(4,442,791)
Net cash flows from operating activities		**14,895,211**	**1,467,365**
Cash flows from investing activities			
Purchase of property, plant and equipment and intangible assets		**(2,691,282)**	(4,676,946)
Withdrawal of deposits, net		**866**	–
Proceeds on disposal of property, plant and equipment and intangible assets		**–**	35,810,114
Acquisition of a subsidiary	5	**(8,894,138)**	–
Other payments, net		**(5,729)**	(22,631)
Net cash (used in) / from investing activities		**(11,590,283)**	**31,110,537**
Cash flows from financing activities			
Repayment of loans	29	**(1,098,415)**	(1,497,415)
Receipt of loans	29	**3,401,079**	9,000,000
Repayment of accounts payable in respect of assets purchased in instalments		**(7,156,553)**	(32,639,268)
Repayment of principal portion of lease liabilities	29	**(196,469)**	(289,462)
Payment of dividends		**(6,000,000)**	–
Net cash used in financing activities		**(11,050,358)**	**(25,426,145)**
Net change in cash and cash equivalents		**(7,745,430)**	**7,151,757**
Effect of changes in foreign exchange rates on the balances of cash and cash equivalents in foreign currency		**(11,574)**	152,428
Change in provision for expected credit losses on cash and cash equivalents		**72,585**	(65,295)
Cash and cash equivalents, beginning		**13,575,088**	6,336,198
Cash and cash equivalents, ending	**13**	**5,890,669**	**13,575,088**

GLOSSARY

KTZ NC JSC
Kazakhstan Temir Zholy National Company Joint-Stock Company

TRANSTELECOM JSC
Transtelecom Joint-Stock Company

AIC
Automatic caller identification equipment

ACS
Automated control system

TED ACS
Traction Energy Dispatch automated control system

ATE
Automatic Telephone Exchange

FOCL
Fiber-Optic Communication Lines

UDP
Unified digital platform

LCF
Line and cable facilities

IFRS
International Financial Reporting Standards

MDDIAI
Ministry of Digital Development, Innovation and Aerospace Industry

SRC
State Revenue Committee

CRM
Cash register machine

KPI
Key performance indicators

OJSC
Open joint stock company

FDO
Fiscal data operator

RSE
Republican state enterprise

DLTS
Distance learning and testing system

QMS
Quality management system

LIS
Lawful interception system

PSTN
Public switched telecommunications network

ISMS
Information security management system

EMS
Environmental management system

EnMS
Energy management system

DC
Data centre

BBA
Broadband access

ARPU
Average revenue per user

HW
Hardware

LTE
Wireless high-speed data transmission standard for mobile phones and other data terminals

M2M
Machine-to-machine communication

MPLS
Mechanism in high-performance telecom networks that routes data from one network node to another using labels

SLA
Service level agreement

VPN
Virtual Private Network

CONTACT INFORMATION

For any questions about the information presented in this report, please contact:

Floor 23, 10 D. Kunayev Street,
Astana 010000, Republic of Kazakhstan

CHANGE MANAGEMENT AND PUBLIC RELATIONS

Tel.: +7 (7172) 61-06-34
E-mail: org@ttc.kz

Any use of the information contained in this annual report must be accompanied by a reference to it.

HOTLINE

8 800 080 86 68
(free from landlines and mobiles within Kazakhstan).

REGISTRAR

Full name: Central Securities Depository JSC

Address: Building 28, Samal-1 Microdistrict, Almaty 050051, Republic of Kazakhstan
Tel.: +7 (727) 262-08-46
Fax: +7 (727) 355-47-60
E-mail: kacd@kacd.kz

www.ttc.kz

Information about Auditor Organisation

By resolution of the General Meeting of Shareholders of 26 October 2023, Ernst & Young LLP was appointed to audit the financial statements of Transtelecom JSC for the years ended 31 December 2023, 2024 and 2025.

EY is a global leader in audit, tax, transaction services and advisory. The audit organisation's experience and the quality of its services help strengthen public confidence in capital markets and economies around the world.

In 1992, Ernst & Young LLP became the first international firm to provide audit and consulting services in Kazakhstan, working with a wide range of organisations including multinational corporations and national and private companies across various industries. Today, Ernst & Young LLP's in Kazakhstan practice employs more than 700 people across three offices, in Almaty, Astana and Atyrau, and offers over 85 types of professional service.

Independent Auditor's Opinion

In the opinion of the external auditor, Ernst & Young LLP, the financial statements of Transtelecom JSC as of 31 December 2025 are presented fairly, in all material respects, in accordance with International Financial Reporting Standards.