Appendix 5
to the Resolution of the General Meeting of Founders (Participants)
of the Teach for Qazaqstan Public Foundation

dated 16 October 2025 (Minutes No. 2)

WHISTLEBLOWING POLICY
OF THE TEACH FOR QAZAQSTAN PUBLIC FOUNDATION

Etfective upon expiry of
10 calendar days from the date of approval

subject to review at least once every two years

Reviewed on "____" _____20____

_____
Full name, signature

Reviewed on "____" _____20____

_____
Full name, signature

Astana, 2025

Translated with AI assistance and reviewed for accuracy.
In case of any discrepancies, the original [Russian] version shall prevail.

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Message from the Director

Dear members of the Teach for Qazaqstan community,

Any violation may cause substantial harm to the Foundation's activities and reputation. We therefore require our employees, and encourage other members of the TFQ community, to raise concerns regarding non-compliance with the Code of Ethics, the Foundation's policies, anti-corruption, anti-fraud and anti-bribery requirements, and other regulatory requirements.

We foster an open environment in which every member of the TFQ community can raise concerns freely.

This Policy provides guidance to Foundation employees and other members of the TFQ community on how to raise concerns regarding violations that have occurred or are occurring within the Foundation, including in the regions where it operates and in areas under its management.

The terms "you", "we", "us" and "everyone" used in this Policy refer collectively and individually to all members of the TFQ community.

1. General Provisions

1. For the purposes of this Whistleblowing Policy of the Teach for Qazaqstan Public Foundation (the "Policy"), the following terms and abbreviations shall have the meanings set out below:

1) Foundation - the Teach for Qazaqstan Public Foundation;

2) governing body of the Foundation - a collegial body (the General Meeting of Founders (Participants) or the Board of Trustees) or the sole executive body (the Director), vested with specific powers in relation to the Foundation pursuant to the Law of the Republic of Kazakhstan on Non-Profit Organisations and the Foundation's Charter, through which the Foundation exercises its legal capacity;

3) Director - the Director of the Foundation or another person acting as Director pursuant to the relevant order and power of attorney;

4) employee - an individual who is in an employment relationship with the Foundation and personally performs work under an employment contract;

5) TFQ community - members of the Foundation's governing bodies, Foundation employees, ambassadors and participants of the Teach for Qazaqstan programme, consultants, experts, assessors, trainers, fundraisers, benefactors, volunteers, and other persons who, in various circumstances (whether for remuneration or on a voluntary basis, permanently or temporarily, regularly or occasionally, at the Foundation's premises or remotely), carry out activities managed by, performed on behalf of, or associated with the Foundation;

6) policies - the Foundation's fundamental internal documents establishing principles and standards of conduct for employees and other members of the TFQ community.

2. The purposes of this Policy are to:

1) manage risks relating to violations of the principles and standards of conduct established by the Code of Ethics and the Foundation's policies;

2) enable members of the TFQ community to raise concerns regarding violations that have occurred or are occurring within the Foundation.

3. This Policy implements the provisions of the Code of Ethics and has been developed in accordance with the Foundation's Charter, the Labour Code of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan on Combating Corruption, and the Law of the Republic of Kazakhstan on Personal Data and Its Protection.

Any matters not expressly regulated by this Policy shall be governed by the legislation of the Republic of Kazakhstan and the Foundation's internal regulatory documents.

2. Preliminary Resolution

4. The Foundation encourages open, respectful and direct discussion of concerns, which helps resolve misunderstandings and prevent escalation. Where it is safe and appropriate to do so, you may first discuss the situation directly with the colleague or participant whose conduct has raised concerns.

5. A matter may, and preferably should, first be discussed directly where:

1) the alleged violation is not serious (for example, a procedural error, misunderstanding or oversight);

2) you have a working relationship that permits open dialogue;

3) both you and the other person feel comfortable and safe having such a conversation.

6. Direct discussion is not advisable where:

1) the matter concerns a serious violation, such as corruption, fraud or physical violence;

2) there may be a conflict of interest or a risk of pressure from the alleged violator;

3) you or the other person do not feel safe or fear retaliation;

4) the violation involves repeated conduct and previous direct conversations have not resolved the matter.

7. For direct discussions, we recommend using the practice of "challenging" - a communication culture in which any member of the TFQ community, irrespective of status, may constructively question or correct another person's words or actions in accordance with TFQ's core principles and values.

When using the practice of challenging:

ask the person for permission to have the discussion so that you can establish whether they are ready and ensure a comfortable and safe setting (a person's mental state or mood, or the

surrounding environment, may at times be unsuitable for dialogue; in such cases, a more appropriate format, including a written format, may be chosen, or the discussion may be postponed to a specific but not unduly distant time);

use language that is as considerate as possible, while remaining direct, clear and constructive;

do not use this practice in the presence of third parties, whether intentionally or unintentionally.

3. Procedure for Reporting a Violation

8. If you have concerns regarding a violation of the Code of Ethics, the Foundation's policies or other regulatory requirements, and preliminary discussion is inappropriate or has not resolved the matter, you should report it using one of the channels specified in paragraph 9 of this Policy (a "violation report").

A violation report must be made in good faith, be truthful and not be motivated by malice. You are not, however, expected to investigate the matter yourself.

9. Except in the circumstances specified in paragraphs 11 and 12 of this Policy, a violation report may be submitted to the Foundation in writing:

1) in hard copy, delivered by hand, courier service or post, or sent by email to the address specified on the Foundation's website for violation reports (the "reporting mailbox"); or

2) electronically (by email or message) to the reporting mailbox, with authentication and identification of the sender;

3) by video message or videoconference.

Reports and complaints concerning incidents of violence and discrimination shall be submitted in accordance with the Comprehensive Zero-Tolerance Policy of the Teach for Qazaqstan Public Foundation on All Forms of Violence and Discrimination.

10. A report must contain:

1) the surname, given name and patronymic (where stated in the identity document), individual identification number (where available), and postal address of the person reporting the violation;

2) the substance of the violation, including information about the person who committed it;

3) a signature.

11. Information regarding a criminal offence being prepared or already committed, or a threat to national or public security, must be reported to the competent public authorities.

If you are uncertain whether the facts giving rise to your concern indicate a criminal offence or a threat to national or public security, you may seek advice from the Foundation's legal counsel.

12. A person who has information concerning a corruption offence being prepared, in progress or already committed within the Foundation shall report it directly to the Director of the Foundation and/or the authorised public authority.

4. Processing Reports Received

13. By order of the Director, the Foundation shall appoint a person responsible for receiving, registering, recording, analysing and retaining violation reports, and for administering the processes established by this Policy (the "Responsible Officer").

Any violation report received by hand, courier service or post, or by video message or videoconference (except in the circumstances specified in paragraph 12 of this Policy), must be forwarded immediately by the recipient to the Responsible Officer.

The Responsible Officer shall register the violation report and forward it to the Director of the Foundation for review and any necessary decision.

A violation report concerning the Director of the Foundation shall be submitted to the Foundation's Board of Trustees.

14. The Foundation must receive, record and review all violation reports.

Reports shall be registered and retained in accordance with the Foundation's rules on records management and document administration.

15. Anonymous reports (where the author cannot be identified), and reports that do not describe the substance of the matter, shall not be reviewed.

16. The Foundation shall not review reports containing indications of a criminal otfence.

A person who has raised a substantiated concern shall be advised to contact the competent

public authorities.

17. Where information is received regarding a corruption offence being prepared, in progress or already committed within the Foundation, the Director shall take measures in accordance with the laws of the Republic of Kazakhstan.

Where an employee of the Foundation reports a corruption offence or otherwise assists the Foundation in combating corruption, and the employee so wishes, the Foundation shall enter into a confidentiality agreement with that employee concerning such assistance, in accordance with the anti-corruption legislation of the Republic of Kazakhstan.

5. Review of Reports Received and Response Measures

18. Violation reports falling within the Foundation's remit shall be reviewed:

1) comprehensively, objectively and on the basis of facts;

2) as promptly as possible, taking into account the complexity and nature of the matter.

19. Upon receiving a violation report, the Director shall review it within no more than three working days and, where necessary, initiate an internal investigation.

An internal investigation shall be conducted in accordance with the Rules for Conducting Internal Investigations of the Teach for Qazaqstan Public Foundation.

20. If the review or investigation identifies indications of a criminal or administrative offence, the review materials shall be submitted to the Director for a decision on whether they should subsequently be referred to the internal affairs authorities, except in the circumstances specified in paragraph 21 of this Policy.

21. If the review or investigation identifies indications of a criminal or administrative offence, or another violation, in an act or omission of the Director, the review materials shall be submitted to the Board of Trustees for appropriate action.

22. The Foundation shall inform the reporting person of the outcome of the review or investigation and the decision taken, while balancing transparency with the need to protect restricted-access information.

6. Confidentiality and Personal Data

23. Violation reports and subsequent investigation reports must be treated with the utmost confidentiality.

Information, including personal data, shall be disclosed only to those employees and/or third parties who need it in order to conduct the review or investigation.

24. Information contained in a report, or the results of an investigation, may be disclosed only in response to a reasoned request and with the written authorisation of the Director; at the request of an authorised public authority or its official; or at the request of an independent auditor for the purposes and in the course of an independent audit of the Foundation's activities under the applicable agreement.

Where considered appropriate or required by applicable law, the Foundation's Charter or this Policy, the Director shall inform members of the Foundation's governing bodies or its auditors of any ongoing or completed investigations.

25. The receipt of reports and any subsequent review or investigation may involve the collection and processing of personal data relating to employees or third parties.

Personal data shall be collected and processed only to the extent necessary and sufficient to review or investigate the violation report and take action on the basis of the outcome.

Personal data shall be collected and processed in accordance with the Foundation's Rules on the Collection and Processing of Personal Data.

7. Protection against Retaliation and Liability

26. Persons who report violations in accordance with this Policy shall not be subjected to any form of adverse treatment or retaliation.

27. A person who reports a corruption offence or otherwise assists, or has assisted, in combating corruption shall be protected by the State in accordance with the laws of the Republic of Kazakhstan and shall be rewarded in accordance with the procedure established by the authorised anti-corruption body.

28. Persons who act in bad faith by making allegations they know to be false, or by

reporting other information they know to be false, including in relation to a corruption offence, shall be liable as prescribed by the laws of the Republic of Kazakhstan.

8. Final Provisions

29. This Policy shall be approved by the General Meeting of Founders (Participants) of the Foundation. Amendments shall be made by issuing a revised version of the Policy.

30. This Policy shall be reviewed at least once every two years to assess its compliance with the legislation of the Republic of Kazakhstan and its alignment with the Foundation's interests and needs. The Director shall be responsible for initiating the review.

If the provisions of the Policy remain unchanged during the period specified in this paragraph, the Policy shall be extended for the next review period. This shall be recorded on the first page by entering "Reviewed", the full name (where applicable), date and signature of the person responsible for the review.

31. This Policy shall be subject to early review in the event of:

1) legislative changes affecting its content;
2) changes in the Foundation's vision, external environment or internal needs;
3) an incident revealing a vulnerability or gap in the Policy;
4) reorganisation of the Foundation;
5) recommendations concerning the Policy from the Foundation's governing bodies, an independent auditor, partners or other relevant parties.

32. The review process shall include collecting proposals from employees, analysing experience from recent periods, and examining good practice. The draft revised Policy shall be discussed by management and approved in accordance with the established procedure.

33. The Policy shall be made available electronically to all employees and programme participants.

34. To ensure effective implementation of the Policy, the Foundation shall familiarize all new employees and programme participants with it. The Policy shall be available to employees in the Foundation's knowledge base.

35. This Policy shall enter into force 10 calendar days after the date of its approval.