
May 27, 2025

BRIEF SUMMARY

Opinion on the Compliance or Non-Compliance of the Kazakhstan Housing Company JSC's Social and Green Bond Framework with the Social Bond Principles.



Based on our independent assessment, we conclude that the Social and Green Bond Framework of "Kazakhstan Housing Company" JSC is aligned with the core components of the Social Bond Principles (SBP), as published by the International Capital Market Association (ICMA), June 2023 editions.

Opinion on assigning a degree of compliance from "Excellent (High)" to "Unsatisfactory (Low)"



Based on the results of our analysis and in accordance with the "Compliance Assessment Map with the Principles", we have assigned the compliance degree of "Excellent (High)" to the Framework. JSC "Kazakhstan Housing Company" demonstrates an excellent level of governance, fund allocation, project evaluation and selection, management of proceeds, and reporting, as well as a high standard of transparency in disclosing information on socially significant projects.

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1. METHODOLOGY

An external review constitutes an independent assessment (Second Party Opinion) and reflects the opinion of Green Investment Group LLP (GIG) regarding the management, administration, and allocation of proceeds from issued social bonds, as well as the reporting and disclosure practices related to eligible projects financed through such instruments. This assessment evaluates the alignment of these aspects with the Principles of the International Capital Market Association (Principles).

Social Bond Principles (The Social Bond The Principles 2023) were developed by the International Capital Market Association.

The preparation of the External Review involves an analysis of relevant documentation, regulatory acts, issuer reports and presentations (where available), as well as other publicly accessible sources that may serve to describe, substantiate, and confirm the alignment of the Issuer's Social Bond Framework and related processes with the Social Bond Principles. The information used for this purpose is obtained through direct engagement with the Issuer and/or from public sources that GIG considers reliable.

Evaluation criteria

The opinion (conclusion) is structured as follows, based on the evaluation conducted in accordance with the established criteria:

1. Opinion on the compliance/non-compliance of the Issuer's Social Bond Framework with the Social Bond Principles.

In this case, the confirmation by GIG of the Issuer's Social Bond Framework as aligned with the specified Principles requires the simultaneous fulfilment of the minimum threshold indicators across all evaluation criteria.

2. Opinion on the Degree of Compliance, Ranging from "Excellent (High)" to "Unsatisfactory (Low)", Based on the "Compliance Assessment Map with the Principles".

This assessment is determined through a weighted scoring methodology that considers the relative importance of each criterion. It serves as supplementary information intended to illustrate the overall degree of alignment with the Principles. This assessment does not constitute a credit rating or any other form of evaluation of creditworthiness or financial attractiveness, and should not be interpreted as such.

Any rating other than "Unsatisfactory (Low)" shall be interpreted as compliant with the Social Bond Principles.

As part of the preparation of the External Review, an assessment is conducted against four core criteria:

- Use of Proceeds
- Project Evaluation and Selection Process
- Management of Proceeds
- Reporting and Disclosure.

The weighted scores for each criterion are aggregated to determine the overall degree of alignment with the Principles, in accordance with the threshold scores set out in the "Compliance Assessment Map with the Principles":

Threshold score in points	Degree	Definitions
High > 4.5	Excellent	The Issuer demonstrates an excellent level of governance, allocation of proceeds, project selection, management of proceeds, and reporting and disclosure related to the implementation of socially significant projects.
Average 3.5-4.5	Good	The Issuer demonstrates a good level of governance, allocation of proceeds, project selection, management of proceeds, and reporting and disclosure related to the implementation of socially significant projects
Satisfactory 3-3.5	Satisfactorily	The Issuer demonstrates a satisfactory level of governance, allocation of proceeds, project selection, management of proceeds, and reporting and disclosure related to the implementation of socially significant projects
Low <3	Unsatisfactory	The Issuer demonstrates an unsatisfactory level of governance, allocation of proceeds, project selection, management of proceeds, and reporting and disclosure related to the implementation of socially significant projects

The final External Review is submitted to the Issuer and subsequently made publicly available. Public dissemination is carried out by publishing the External Review on the Green Investment Group website – www.greeninvest.kz – and may also include distribution through newswire press releases and/or other relevant web platforms.

Detailed information on the Methodology used by Green Investment Group to prepare External Reviews assessing the alignment of company framework related to green, social, and sustainable finance instruments with the Green Bond Principles, Social Bond Principles, Green and Social Loan Principles, and Sustainability Bond Guidelines is available at www.greeninvest.kz.

2. BRIEF DESCRIPTION OF THE ISSUER AND THE SOCIAL AND GREEN BOND FRAMEWORK, AS WELL AS OTHER STRATEGIC DOCUMENTS OF THE COMPANY

The Company has adopted the Social and Green Bond Framework, as approved by the Management Board of "Kazakhstan Housing Company" JSC (as amended on May 20, 2025), with the aim of formalizing its approach to raising funds – particularly through the issuance of social bonds – and allocating such funds toward the implementation of eligible projects aligned with the Company's strategic objectives.

The Company is committed to adhering to the four core components of the Social Bond Principles in relation to the proceeds raised from the issuance of social bonds:

1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting

The Social and Green Bond Framework (hereinafter – the Framework) is applicable to ensure transparency in the investment-raising activities of "Kazakhstan Housing Company" JSC (hereinafter – the Company or the Issuer) through the issuance of social bonds. The projects financed by the Company fall under the eligible project categories defined in the Principles.

The Framework provides for the disclosure of information on the allocation of proceeds from social bonds, investment directions, and the social impact of the financed activities. Such disclosures are made on an annual basis on the Issuer's official website at <https://www.khc.kz> in accordance with applicable disclosure regulations.

The Company has established processes for the accounting, management, and monitoring of the use of proceeds in accordance with its internal Regulation on the Selection and Evaluation of Eligible Green and Social Projects. The relevant structural units are designated as responsible for the implementation of these processes.

In the implementation of eligible projects, the Company ensures:

- A transparent and objective process for the evaluation and selection of social projects;
- Proper tracking of the earmarked use of proceeds from social bonds in connection with eligible projects;
- Monitoring of indicators related to the resolution or mitigation of specific social issues and/or the achievement of positive social outcomes.

The Company is committed to sustainable development by establishing fundamental standards, principles, rules, and approaches in building its governance system. It also seeks to contribute to the achievement of the Sustainable Development Goals (SDGs) through the implementation of the following KPIs:

No.	KPI	SDG
1.	Financing the construction, acquisition, and renovation of housing through the repurchase of municipal bond issues (issued by local executive bodies)	No. 9 "Industrialization, innovation and infrastructure" No. 11 "Sustainable Cities and Communities"
2.	Volume of issued guarantees and subsidies	No. 11 "Sustainable Cities and Communities"
3.	Volume of housing commissioned under the financing of urban development investment projects	No. 11 "Sustainable Cities and Communities"
4.	Expansion of the multi-apartment residential housing market through mechanisms of shared-equity construction	No. 11 "Sustainable Cities and Communities"
5.	Provision of rental housing with a buyout option	#10 "Reducing Inequality" No. 11 "Sustainable Cities and Communities"

Company Overview

"Kazakhstan Housing Company" Joint Stock Company (formerly known as "Kazakhstan Mortgage Company") was established in 2000 pursuant to a resolution of the Management Board of the National Bank of the Republic of Kazakhstan, with the purpose of implementing the Concept for Long-Term Housing Finance and the Development of Mortgage Lending.

In 2020, by instruction of the Head of State, "Kazakhstan Mortgage Company" JSC was reorganized through the merger with "Baiterek Development" JSC and "Housing Construction Guarantee Fund" JSC. Following the reorganization, in accordance with Resolution No. 557 of the Government of the Republic of Kazakhstan dated September 8, 2020, "On Certain Matters of the Unified Housing Construction Operator", the Company was designated as the Unified Housing Construction Operator. In January 2021, it was renamed to "Kazakhstan Housing Company" JSC. The Company inherited the core business functions of the merged entities and is also developing a range of new activities in line with its approved Development Strategy for 2024-2033.

The sole shareholder of the Company is "National Managing Holding "Baiterek" JSC .

As the Unified Housing Construction Operator, the Company is responsible for implementing government measures aimed at improving access to quality and comfortable housing for the population of Kazakhstan. This includes support for the construction sector, and the creation of conditions for a balanced growth in housing supply and demand, including the mortgage lending market.

Mission: To provide the people of Kazakhstan with access to affordable and quality housing.

Vision: To be the key development institution for ensuring access to affordable housing for the population of Kazakhstan.

To achieve its mission and vision, the Company will pursue the following key strategic directions:

Direction 1. Supporting Housing Supply

Objective: Increase the volume of housing construction by stimulating private sector participation and servicing developers

Tasks:

- 1) Financing the construction, acquisition, and renovation of housing through the repurchase of bonds issued by local executive authorities;
- 2) Guaranteeing equity participation in housing construction;
- 3) Subsidizing loans to private developers;
- 4) Financing urban development investment projects.

Direction 2. Supporting Housing Demand

Objective: Enhance the affordability of housing for citizens of Kazakhstan

Tasks:

- 1) provision of rental housing;
- 2) subsidizing mortgage loans.

USE OF PROCEEDS

By adopting the Framework, the Company declares that the proceeds raised from the issuance of social bonds will be allocated to the financing or refinancing of social projects aimed at addressing specific social issues and achieving positive social outcomes. The outcomes of eligible projects may be measured using both quantitative and qualitative indicators.

According to the Framework, the Company defines eligible social projects as those that fall within, but are not limited to, the following categories:

- Construction of green affordable housing;
- Infrastructure development;
- Providing loans to socially vulnerable groups of the population;
- Social housing;
- Development of social infrastructure.

PROJECT EVALUATION AND SELECTION PROCESSES

According to the Company, the evaluation and selection of social projects, as well as the implementation of the Framework, are carried out by the following structural units:

- The unit responsible for formulating and implementing the Company's investment policy;
- The unit responsible for developing proposals related to the creation and modernization of national projects and state housing programs, including the development of integrated urban planning standards;
- The unit responsible for monitoring the construction process and controlling the targeted use of funds in the Company's housing investment projects;
- The unit responsible for organizing and maintaining accounting and tax records, including controls and the correct reflection of transactions in on- and off-balance sheet accounts.

The project evaluation and selection process is governed by the Company's Regulation on the Selection and Evaluation of Eligible Green and/or Social Projects. The process includes the following stages:

- Screening of projects for alignment with eligible social project categories;

- Assessment of projects for alignment with the Company's mission and strategic objectives, including risk analysis, particularly in the context of investment project assessment against Environmental, Social, and Governance (ESG) principles;
- Review and approval of project implementation conditions;
- Engagement of external consultants for evaluation and selection of social projects, if necessary;
- Final decision on whether the project meets the categories and criteria of Eligible Social Projects.

If a project is deemed eligible, it is approved for implementation.

MANAGEMENT OF PROCEEDS

According to the Framework, the Company states that proceeds from social bonds shall be recorded separately in a designated sub-account titled "Social Bonds".

The structural unit responsible for organizing, managing, and implementing an effective process for the administration of social bond proceeds conducts quarterly monitoring of the sub-account balance, the current status of available funds, and any discrepancies between the total volume of social projects and the funds raised through social bonds.

The Company reserves the right to invest unallocated proceeds from social bond issuances in permitted financial instruments in accordance with its Investment and Borrowing Policy. Such instruments shall be liquid and high-quality. At the same time, the Company will make every effort to allocate unutilized proceeds to eligible social projects as promptly as possible.

Projects deemed non-compliant with the defined categories and criteria of eligible social projects are not permitted to be financed or refinanced with proceeds from social bonds.

REPORTING

The Company declares that it will disclose information on the allocation of proceeds from social bonds, provide a summary of eligible projects, and report on the achievement of both qualitative and quantitative indicators related to project implementation on an annual basis via its official website: <https://www.khc.kz>, in accordance with its Information Disclosure Rules.

The reporting will include, but will not be limited to, the following information:

- 1) Allocation of proceeds from social bonds:
 - Net proceeds raised from each social bond issuance;
 - Amounts allocated to each social project;
 - Balance of unallocated proceeds as of the end of the reporting period.
- 2) Outcomes of social project implementation:
 - Status and stage of implementation of each social project;
 - Quantitative and qualitative indicators reflecting achieved social impact;
 - Deviations from the expected social outcomes and explanations thereof.

3. ASSESSMENT OF THE COMPANY'S SOCIAL AND GREEN BOND FRAMEWORK

This section outlines the evaluation of the Company's Social and Green Bond Framework, as well as other relevant documents, in terms of their alignment with the Principles, in accordance with the GIG External Review Methodology. The information used for this purpose was obtained through direct engagement with the Company.

OVERALL ASSESSMENT AND DETERMINATION OF ALIGNMENT WITH THE PRINCIPLES

The Company has confirmed that 100% of the proceeds from its social bond issuance will be allocated to eligible social projects in the areas of green and affordable housing construction, infrastructure development, lending to socially vulnerable populations, social housing, and the development of social infrastructure.

The categories of projects to be financed through social bond proceeds are consistent with those defined under the Social Bond Principles.

The project evaluation and selection processes, as well as the management of proceeds, are in line with the core components of the Principles. Furthermore, reporting on the use of proceeds and the social outcomes achieved is to be disclosed annually and made publicly available on the Company's official website.

Opinion on compliance/non-compliance of the Company's Social and Green Bond Framework with the Principles

Based on the assessment of the defined criteria and the fulfillment of threshold indicators, we conclude that the Framework of "Kazakhstan Housing Company" JSC meets all mandatory and several additional criteria. We therefore confirm that the Company's Social and Green Bond Framework is aligned with the Social Bond Principles.

Opinion on the Degree of Alignment with the Principles, from "High (Excellent)" to "Low (Unsatisfactory)"

Based on our analysis and in accordance with the "Compliance Assessment Map with the Principles", we have assigned a degree of alignment of "High (Excellent)". The Company demonstrates an excellent level of governance, allocation of proceeds, project evaluation and selection, management of proceeds, and reporting and disclosure with respect to the implementation of socially impactful projects.

Degree of compliance	Weighted average score	Description
High (Excellent)	4.9	The Issuer demonstrates an excellent level of governance, allocation of proceeds, project evaluation and selection, quality of proceeds management, and reporting and disclosure related to the implementation of socially impactful projects.

ASSESSMENT UNDER THE CRITERION "USE OF PROCEEDS"

The Company has confirmed that the proceeds from social bonds are intended exclusively for the financing and/or refinancing (in whole or in part) of social projects, in accordance with this Framework and other internal documents of the Company.

Indicator	Score	Project category compliance according to the Social Bond Principles	Threshold compliance	Weighted assessment according to the significance of the criterion -45%
100% of the proceeds are allocated to the financing and/or refinancing of social projects that demonstrate a significant social impact and have been assessed by the Issuer as aligned with the eligible project categories under the Social Bond Principles, based on qualitative and/or quantitative indicators	5	<ul style="list-style-type: none"> • Construction of green affordable housing; • Infrastructure development; • Providing loans to socially vulnerable groups of the population; • Social housing; • Development of social infrastructure 	Yes	2.25

ASSESSMENT UNDER THE CRITERION "PROJECT EVALUATION AND SELECTION PROCESS"

The Company's Framework and strategic objectives are consistent with the Social Bond Principles, enabling a thorough analysis of decision-making processes. According to the Framework, the project evaluation and selection process aligns with the requirements of the Principles. Decisions under the Framework are made by a collegial authorized body of the Company. The Framework and the Regulation on the Selection and Evaluation of Eligible Green and/or Social Projects define the operating principles, responsibilities of the relevant structural units, procedures for the assessment and selection of eligible projects, as well as processes for maintaining records and monitoring eligible assets.

Projects that meet the eligibility criteria are approved and entered into the register of eligible assets for the purpose of separate accounting and further monitoring. The Framework also provides for procedures governing the temporary placement of unallocated proceeds from social bond issuances until appropriate eligible projects are identified and selected.

Indicator	Score
Mandatory indicators	
1. The Issuer's strategy, policy, and objectives are aligned with the Social Bond Principles, allowing for a thorough analysis of the decision-making processes for selecting projects that correspond to eligible project categories	1
2. Disclosure of the key methodologies and assumptions used to determine the alignment of projects with the eligible project categories	1
3. Availability and disclosure of descriptions of eligible projects, both actual and/or anticipated (planned) for implementation	1
Optional indicators	
4. The Issuer has established or designated a dedicated unit responsible, among other functions, for overseeing the selection and implementation of projects. The unit's staff generally demonstrate an understanding of their responsibilities and possess relevant experience in supporting social projects. The involvement of an independent and qualified external party in the decision-making process for selecting projects aligned with social project categories	1
5. The Issuer holds quality certifications for implemented social projects or has received conclusions from leading international or independent Kazakhstani verifiers confirming the compliance of the projects with required standards. This includes verification of compliance with current regulatory requirements for infrastructure facilities, as documented in the project design documentation. Leading verifiers are considered those possessing recognized certifications or licenses for conducting assessments, or with a proven track record in evaluating social projects, the quality of social services (for social projects), and/or compliance with sustainable investment criteria	-
6. Existence of procedures for identifying and managing social risks. A supplier/partner selection policy is in place to ensure the achievement of positive social outcomes	0.5
Threshold compliance	Yes
Weighted score for the significance of the criterion – criterion score "4.5", criterion weight 20%	0.9

ASSESSMENT UNDER THE CRITERION "MANAGEMENT OF PROCEEDS"

The Company's Framework provides for the separate accounting of funds raised through the issuance of social bonds. In accordance with the Framework, the allocation and management of these proceeds will be carried out by a designated structural unit responsible for organizing, ensuring, and implementing an effective process for managing the proceeds. This unit conducts quarterly monitoring of the sub-account balance, the current status of unallocated funds, and identifies any discrepancies between the total volume of social projects and the proceeds raised from social bonds.

The Company has also stated that unallocated proceeds from social bond issuances may be temporarily invested in permitted financial instruments, in accordance with the Investment and Borrowing Policy of "Kazakhstan Housing Company" JSC, namely in liquid and high-quality

instruments. At the same time, the Company will make every reasonable effort to allocate such temporarily available funds to eligible social projects as promptly as possible.

A positive aspect in mitigating risks related to the targeted use and management of proceeds is the Company's commitment to monitoring the alignment of eligible assets with the Principles and, if necessary, updating the register of eligible assets accordingly.

In light of the above, we consider that the Company's practices under the "Management of Proceeds" criterion are aligned with the Principles. Additionally, the Framework allows for the engagement of an independent external consultant to assess the proceeds management process. The Company also affirms that, in the event of any amendments and/or additions to the Framework, it will ensure that the External Review is updated accordingly to reflect such changes.

Indicator	Score
Mandatory indicators	
1. Proceeds from social bonds are recorded in a separate sub-account(s), transferred to a segregated portfolio, or otherwise separately tracked by the Issuer	1
2. The Issuer has established a documented procedure for accounting the inflow of proceeds from social bonds	1
3. The Issuer conducts ongoing monitoring of the proceeds throughout the life of the relevant financial instruments (including via sub-account(s)) and has implemented a procedure for the removal of assets from the eligible portfolio if they cease to meet the eligibility criteria.	1
Optional indicators	
4. Availability of formal rules for the temporary investment of unallocated proceeds	1
5. Audit by an external organization or an independent internal audit unit	1
Threshold compliance	Yes
Weighted score for the significance of the criterion – criterion score "5", criterion weight 15%	0.75

ASSESSMENT UNDER THE CRITERION "REPORTING AND DISCLOSURE"

To enhance transparency, the Company affirms its commitment to disclosing information on the allocation of proceeds from social bonds and the achievement of positive social outcomes. Reporting is to be prepared on an annual basis and published on the Company's official website: <https://www.khc.kz>.

In accordance with the adopted Framework, the reporting will include, but not be limited to, the following information:

- 3) Allocation of proceeds from social bonds:
 - Net proceeds raised from each social bond issuance;
 - Amounts allocated to each social project;
 - Balance of unallocated proceeds as of the end of the reporting period.
- 4) Outcomes of social project implementation:
 - Status and stage of implementation of each social project;
 - Quantitative and qualitative indicators reflecting achieved social impact;
 - Deviations from the expected social outcomes and explanations thereof.

Indicator	Score
Mandatory indicators	
1. Detailed reporting is provided, including a project-by-project breakdown, disclosing the use of proceeds from social bonds	1
2. The reporting includes disclosures on the nature of the investments and the achievement of positive social outcomes Methodologies and assumptions used for calculating social impact indicators clearly defined	1
3. It is stipulated that such reporting will be published at least annually, and a procedure is in place for monitoring the accuracy of the disclosed data	1
Optional indicators	
4. The Issuer provides for the involvement of independent qualified parties to assess its reporting in relation to the implementation of the Social Bond Framework	1
5. The Issuer conducts internal monitoring of its reporting and verifies the accuracy of published data at least quarterly	1
Threshold compliance	Yes
Weighted score for the significance of the criterion – criterion score "5", criterion weight 20%	1

Assumptions and limitations

All rights reserved. No part of this External Review may be reproduced, transmitted, or published in any form or by any means without the prior written consent of GIG.

This External Review reflects our opinion on the expected outcomes of the use of green, social, and/or sustainability finance instruments, and the alignment of the issuer's Framework on green, social, and/or sustainability finance instruments with the Green Bond Principles, Social Bond Principles, Green and Social Loan Principles, Sustainability Bond Guidelines, and the Harmonised Framework for Impact Reporting. The final conclusion may be subject to inaccuracies due to unforeseen changes in the economic environment and financial markets.

The External Review is an independent opinion based on the information provided by the issuer and is assessed using GIG's methodology for evaluating the alignment of issuer Framework with the Green Bond Principles, Social Bond Principles, Green and Social Loan Principles, Sustainability Bond Guidelines, and the Harmonised Framework for Impact Reporting. It does not disclose any confidential information of the issuer and does not constitute investment advice or a recommendation to make any investment decisions.

This External Review is provided for informational purposes only, and GIG accepts no liability for any loss or damage arising from the use of this document and/or the information contained herein.

The External Review may be updated after publication, with the reasons for such updates clearly stated.

Further details on the Green Investment Group's methodology for preparing External Reviews evaluating issuer Framework in the field of green, social, and/or sustainability finance instruments against the Green Bond Principles, Social Bond Principles, Green and Social Loan Principles, Sustainability Bond Guidelines, and the Harmonised Framework for Impact Reporting are available at: www.greeninvest.kz.

General Director
"Green Investment Group" LLP
Zhanna Tuyenbayeva
27/05/2025



Register of documents used for the preparation of the External Review of Kazakhstan Housing Company JSC (hereinafter referred to as the Company):

- The Company's Charter
- License for Conducting Banking Operations
- Resolution of the Government of the Republic of Kazakhstan dated September 8, 2020 No. 557 "On Certain Matters of the Unified Housing Construction Operator"
- Social and Green Bond Framework (dated May 20, 2025)
- Regulation on the Selection and Evaluation of Eligible Green and/or Social Projects (dated May 22, 2025)
- Extract from MINUTES No. 47 of the in-person meeting of the Management Board of "Kazakhstan Housing Company" JSC dated May 20, 2025 (Item 5: Approval of Amendments to the Social and Green Bond Framework)
- Extract from MINUTES No. 49 of the in-person meeting of the Management Board of "Kazakhstan Housing Company" JSC dated May 22, 2025 (Item 6: Approval of the Regulation on the Selection and Evaluation of Eligible Green and/or Social Projects)
- Investment and Borrowing Policy of "Kazakhstan Housing Company" JSC (as amended as of February 2, 2023)
- Risk Management Policy (dated September 22, 2015)
- Risk Register and Risk Management Action Plan of "Kazakhstan Housing Company" JSC for 2025
- Development Strategy of "Kazakhstan Housing Company" JSC for 2024-2033 (dated November 30, 2023)
- Sustainable Development Policy (dated January 18, 2022)
- Information Disclosure Policy (dated November 20, 2015)
- Corporate Governance Code (dated February 6, 2018)
- Code of Business Ethics (dated April 30, 2021)
- Resolution of the Government of the Republic of Kazakhstan dated December 25, 2024 No. 1102 "On the Approval of the National Project 'Modernization of the Energy and Utility Sectors'"
- Resolution of the Government of the Republic of Kazakhstan dated September 23, 2022 No. 736 "On the Approval of the Concept for the Development of Housing and Utility Infrastructure for 2023–2029"