Kcell

Establishing a solid base for future growth

Annual Report and Accounts 2020

Kcell is the foremost leader in Kazakhstan's fast-expanding telecoms market.

Its 4G/LTE network enables innovative, value-added digital services and high-quality business solutions that are underpinned by a focus on customer value management.

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Focusing on supporting our society

To assist our customers during this difficult period, we made sure that all channels of communications were able to continue uninterrupted.

04

Delivering technology and service excellence

Our approach is underpinned by a customer-centric focus and attractive tariffs that add value through access to high-quality digital content.

2020 HIGHLIGHTS

Total revenue (KZT million)

174,684

11.5% YoY — 2019: **156,657**

Service revenue (KZT million)

140,049

1.8% YoY — 2019: **137,564**

B2B revenue (KZT million)
excluding off-net bulk sms

18,730

28.5% YoY — 2019: **14,581**

EBITDA (KZT million)
excluding non-recurring items

72,147

12.1% YoY — 2019: **64,364**

Handset sales (KZT million)

34,634

81.4% YoY — 2019: **19,091**

Subscribers (000's)

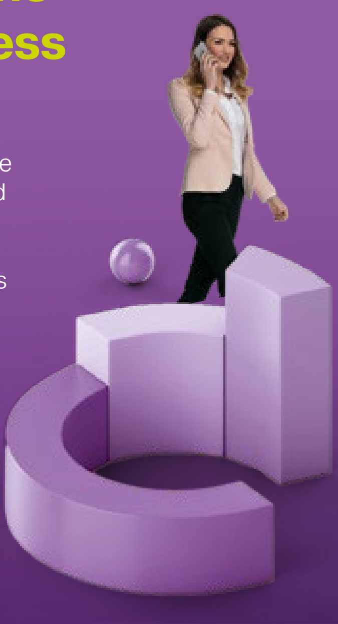
8,055

2.7% — 2019: **8,275**

06

Providing the best business solutions

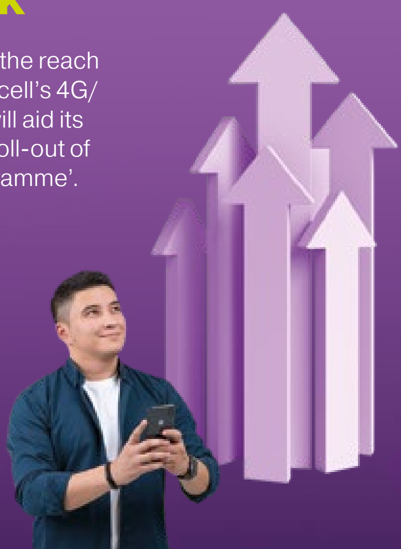
We developed innovative packages that facilitated working from home and network connectivity to meet changing business needs this year.



08

Expanding our high quality network

The strength of the reach and quality of Kcell's 4G/LTE coverage will aid its support of the roll-out of the '250+ programme'.



Focusing on supporting our society

Since the start of the quarantine period, we have focused on supporting our society and providing the tools to assist our customers as we all grapple with the personal and professional challenges that the pandemic has created.

Kcell has introduced free calls and internet traffic for medical professionals. We have also provided all our customers with free access to more than 400 e-learning web sites, to online book, movie and TV entertainment services and to online banking services mobile applications. In addition, we have granted bonus minutes and free roaming data for those subscribers who have not been able to return to Kazakhstan as a result of the current state of emergency.

We also provided uninterrupted mobile service when subscribers' balance reaches zero. From early days of quarantine in Kazakhstan we urged our customers to remain home by displaying the slogan UYDEBOL (meaning "stay home" in Kazakh). Our initiatives were clearly communicated across all digital touchpoints, emphasizing our overarching message "Stay home, Kcell is at your service".

Free and bonus services

During the pandemic, Kell provided its subscribers with free access to the entire Kaznet, including university websites, reference databases, online diaries, e-education portals and resources recommended by the Ministry of Education and Science. It also covered free access to banks and mobile banking. Jańa tariff subscribers were additionally able to activate a daily free bonus package of 30 minutes' voice communication. With quarantine restrictions in place, the Company introduced remote replacement and free delivery of SIM cards.

Free calls

and internet traffic for 3,500 medical professionals

400
Provide free access to more than 400 e-learning websites

27
online banking services and mobile applications

5,000
roaming subscribers provided 30 bonus minutes and 3 GB free traffic

4G
communication for a modular infectious hospital

Uninterrupted
mobile service when subscribers' balance reaches zero

UYDEBOL
slogan displayed on subscribers' handset screen (meaning "Stay Home" in Kazakh)

Delivering technology and service excellence

Our customer-centric approach helps us retain our position in a highly competitive market.

Revenue growth partially driven by a rise in subscribers for high quality attractive tariff plans which include variety of additional services (ivi TV, Yandex+, Mobi Doctor, etc.).

Continued focus on the development and launch of innovative and attractive bundled offers, as well as proactive promotion across all channels.

4G device penetration growth supported by contract phones sales.

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CASE STUDY

Launch of Simkomats self-service terminals

In April 2020, Kcell introduced Simkomats self-service terminals mindful of the communication needs of its customers during the COVID-19 pandemic. Simkomats provide remote services such as new SIM, SIM change, top-up and E-SIM using biometrical ID scan and will also improve the overall customer experience in the long-term.

Read more on page 27

CASE STUDY

Kcell and Samsung collaboration

In September 2020, we opened the second of our co-branded Kcell and Samsung stores in Shymkent, following our first successful collaboration with the mobile phone company in 2019 in Almaty. Consultants are on hand to tell visitors to the stores all about the advantages of different Samsung smartphone models and contract offers. Customers are then able to test out the smartphones before buying and get a full range of standard services, including number activation, tariff selection and balance top-up. It is now over five years since we launched our Kcell/Activ exclusive retail chain, which has proved extremely popular with 35 stores throughout Kazakhstan.

Providing the best business solutions

We offer attractive business solutions and devices with progressive tariff plans to enable connectivity

- Corporate mobile
- Virtual PBX
- Outsourced call-centre
- Devices with connectivity
- Fixed internet
- IT infrastructure
- M2M
- Big data
- Private LTE
- IoT
- IT security
- Mobile work place

B2B revenue

+28.5%

(excluding off-net bulk sms)

Business solutions

62.7%

of total B2B revenue

CASE STUDY

Working from home and connectivity

As part of our commitment to supporting our customers during the pandemic, we worked with the Ministry of Education to provide connected devices and tools to assist with online education, including free access to 400 e-learning sites. We have also developed a range of packages specifically designed to meet the connectivity needs of those working remotely from home across Kazakhstan.

Expanding our high quality network

Kcell's 4G/LTE coverage reaches 65% of the population and, at the same time, has significantly improved the quality of our services

65%

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LTE traffic of total data traffic
75.1%

LTE population coverage
65.1%

3G population coverage
83.8%

CASE STUDY

250+ project delivers high-speed access

Kcell has signed up to a network sharing initiative together with Kazakhstan's two other mobile providers (Beeline and Tele2). As part of the country's 250+ project, the initiative aims to deliver high-speed internet access to rural communities with populations of 250 or more. The digital project will provide 3G and 4G connectivity from all three operators to 1,600 rural settlements with a combined population of 1 million, and also give them access to new services including distance learning, telemedicine, mobile financial services as well as government digital resources. Each mobile operator will have equal access to the shared network.

Read more on page 29

AT A GLANCE

Network

75.1%

Share of LTE in data traffic

B2C

71.4%

4G device penetration among Kcell customers

B2B

62.7%

Share of revenues from business solutions

Coverage

65.1%

Share of population with 4G/LTE access

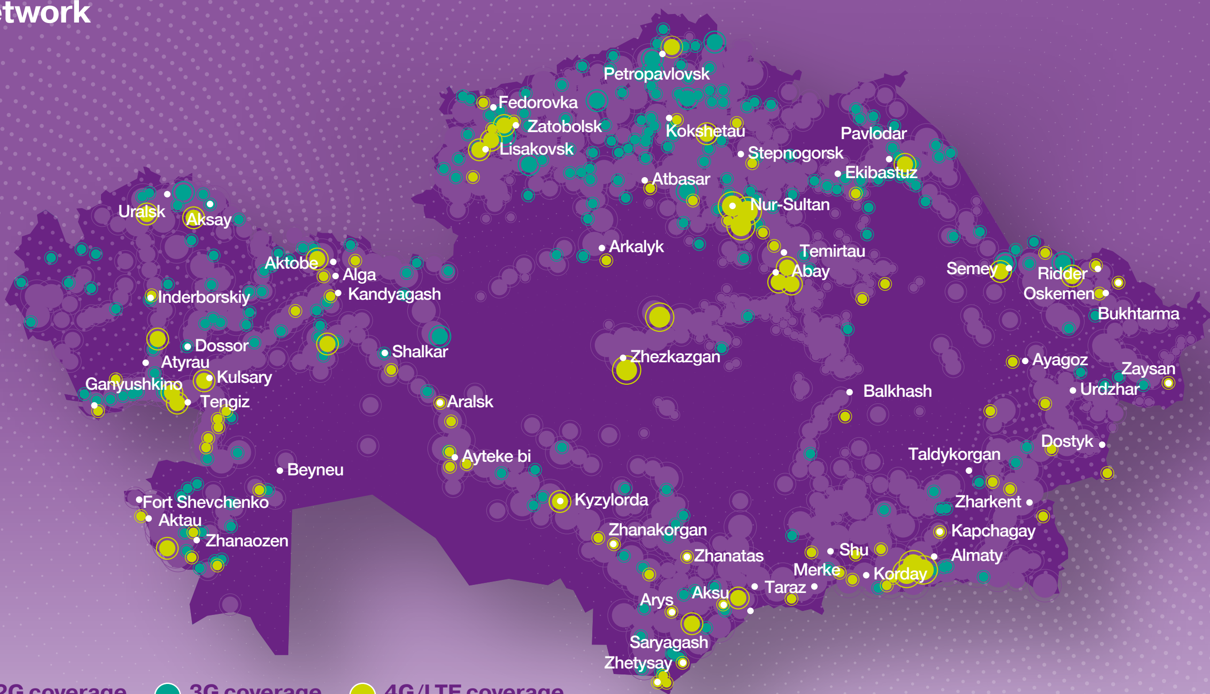
Employees

2,249

employees in the Company

Transforming ourselves to maintain future leadership

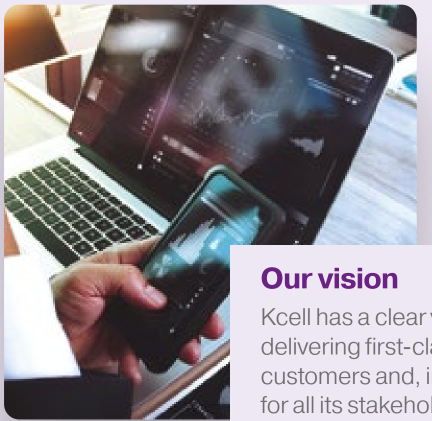
Network



2G coverage 3G coverage 4G/LTE coverage

Our Company

Kcell provides the full range of mobile telecommunication services, including voice, messaging, value-added (multimedia and mobile content) and data transmission (internet access). Its two key brands are among the best established in Kazakhstan: Kcell for B2B (corporate subscribers and public organisations) and Activ for B2C (individual consumers). At the end of 2020, the Company had 8.1 million subscribers, while 65.1% of the population had access to its 4G network and 83.8% to its 3G service.



Our vision

Kcell has a clear vision for the future: delivering first-class services to its customers and, in turn, creating value for all its stakeholders, including the Republic of Kazakhstan. It will achieve this through further investment in its network and the introduction of additional value-added services while retaining its focus on competitive pricing. The Company's commitment to best practice in corporate governance underpins the quality of it financial and operational performance.

Products and services

Kcell provides the full spectrum of mobile telecommunication products and services to both individuals and organisations. Alongside voice, SMS, MMS and data transmission, it offers internet access and value-added services, including mobile content. These include various OTT services under the Mobi brand (TV, Music, Kino, Press, Bookmate) and unique mobile financial services (Mobimoney). An increased focus on the sale of handsets has enabled the Company to expand its offering and meet more of its customers needs.

Over the past two decades, Kcell has built one of the most modern, technologically advanced and extensive mobile telecommunication networks in Kazakhstan. Looking to the future, integration with country's infrastructure should allow the Company to significantly increase both its offering and its overall customer base, providing an improved service quality at reduced cost to the business.

Kcell has licences to operate on 2G, 3G and 4G/LTE frequencies indefinitely. Its network is collocated and operates on four frequency bands – 700/800 MHz, 900 MHz, 1700/1800 MHz and 2100 MHz – providing both data and voice communications. Data transfer speeds range from 300 kbps for 2G to 37 mbps for 3G and up to 74 mbps for 4G and 221 mbps for 4G+.

Projects with Kazakhtelecom

Exploiting the synergies between our major shareholder Kazakhtelecom and Kcell is a key focus to enabling us both to gain competitive advantages. Integrating Kcell and Tele2 networks marked our first joint product initiative and, alongside this, plans to combine radio access networks with that of Kazakhtelecom companies is progress well.

MILESTONES AND KEY EVENTS OF 2020

We've come a long way

In 1998, Kcell became the first company to receive a licence to provide cellular services on the GSM-900 standard in Kazakhstan. In December 2018, Kazakhtelecom acquired a 75% stake in Kcell, enabling the Company to move forward with its ambitious agenda.

The transaction allowed the two partners to begin to exploit the clear synergies between them, in particular, by giving Kcell access to Kazakhtelecom's infrastructure.

01/20

Board of Directors

An Extraordinary General Meeting of Shareholders (EGM), held on 15 January 2020, adopted the decision to elect Jere Calmes as an Independent Director on the Kcell Board of Directors. His terms of office will be effective from the election date until its expiration as agreed at the EGM on 25 January 2019.

Cross-listing on AIX

On 6 February 2020, Kcell's ordinary shares and GDRs were admitted to the Astana International Exchange (AIX) Official List. Trading commenced on 7 February 2020.

02/20

03/20

Agreement with KaR-Tel

On 4 March 2020 Kcell and KaR-Tel signed a Frequency Sharing Agreement, which allows KaR-Tel the right to share 5 MHz radio frequency within the 1725-1730 MHz band and 1820-1825 MHz band.

Milestones

1998
On 1 June 1998, Kcell was established as GSM Kazakhstan OAO Kazakhtelecom to operate a cellular telecommunications network in Kazakhstan.

1999
After receiving the first GSM licence in Kazakhstan, the Company officially launched its mobile communications network in February 1999, operating under the Kcell trademark, adding the Activ brand in the following September.

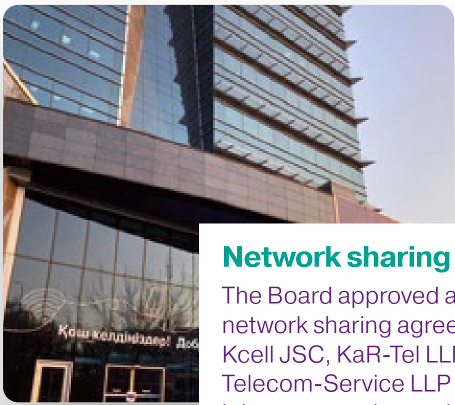
2003
In September 2003, Kcell became the first telecommunications operator in Kazakhstan to launch General Packet Radio Service (GPRS) and Multimedia Messaging Service (MMS) functionality.

2005
In September 2005, the Company was the first cellular operator to introduce GPRS roaming in Kazakhstan.

2010
In December 2010, Kcell officially began operating dedicated 3G networks in Astana and Almaty, significantly improving the quality of data transfer services.

2012
In February 2012, Kazakhtelecom sold its 49% stake to Sonera Holding B.V. (Sonera), a subsidiary of TeliaSonera. In December 2012, the Company successfully completed its offering of global depositary receipts (GDRs) on the London Stock Exchange and ordinary shares on the Kazakh Stock Exchange.

05/20



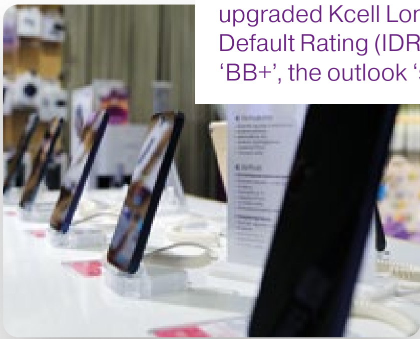
Network sharing agreement

The Board approved a trilateral network sharing agreement between Kcell JSC, KaR-Tel LLP and Mobile Telecom-Service LLP to commence joint construction and operation of a mobile broadband network for settlements of 250 -1,000 people with rail and road access.

06/20

Rating upgrade

On 24 June 2020, Fitch Ratings upgraded Kcell Long-Term Issuer Default Rating (IDR) from 'BB' to 'BB+', the outlook 'stable'.



12/20

Departure of Kaspars Kukelis

On 21 December 2020, the Company announced that Kaspars Kukelis, Chairman of the Management Board, Chief Executive Officer, would be transferring to another position in the Kazakhtelecom JSC group of companies from 3 January 2021.

New acting Chief Executive Executive Officer and Chairman

Yuri Kharlamov, a member of the Management Board and Chief Financial Officer, was appointed as Chairman of the Management Board, Chief Executive Officer, effective from 6 February 2021. Yuri Kharlamov had been acting Chairman of the Management Board and Chief Executive Officer from 3 January 2021.

2014

In May 2014, Kcell became an official distributor of iPhone in Kazakhstan; while in September, it launched a major rebranding campaign for the Activ brand.

2015

In March 2015, the Company opened its first branded Kcell store in Almaty, a new concept aimed at improving customer experience.

2016

In January 2016, Kcell acquired additional spectrum rights on 700/800 MHz and 1800 Mhz bands, boosting its nationwide connectivity and preparing for the launch of advanced 4G and LTE services later in the year.

2017

The international ratings agency Fitch assigned the Company a long-term issuer default rating of 'BB', the outlook 'stable'.

2018

In December 2018, Telia and Fintur sold their 75% stake in Kcell to Kazakhtelecom.

2019

In the first full year following the Kazakhtelecom acquisition, the Company appointed a new Board led by independent members, which outlined a new strategic vision and established a new executive team to implement it. The year marked a clear turnaround for Kcell with increased revenues of 4.6%, the first improvement in its key financial indicators for five years.

Supporting our employees and customers

Dear Shareholders,

As we reported last year, emergency measures were introduced in Kazakhstan in mid-March in response to the spread of the COVID-19 virus. At the time, while this was already impacting business activity, both the duration of the quarantine and its implications generally were unpredictable. Despite the national lockdowns, Kcell still delivered a strong set results in service revenue and the sale of devices, which were both supported by sales through online channels.

Our first priority during this period was the safety of our employees and the second, as a good corporate citizen, was to support our customers. Remote working was introduced where possible with full technical support and access to online conferencing and training.

The personal safety for those required to work on the front line was ensured through workplace transport, personal protective equipment (PPE) supplied and sanitised offices. We created a Department of Medical Aid with trained staff and equipment. In total, we committed KZT323 million to countering the spread of COVID-19 among our employees and the wider population.

The Company played an active role in helping our customers during what were very uncertain times. Most importantly, we backed our medical professionals by providing them with free calls and internet access. We also gave all our customers free access to a wide range of educational and entertainments platforms as well as facilitating online banking services. Uninterrupted services became ever more vital and, for those subscribers unable able to return to Kazahstan due to closed borders or finding themselves with zero balances, we ensured continuity and peace of mind.

Performance in 2020

Against this difficult economic backdrop, I am particularly pleased that Kcell is able to report a robust performance, both financially and operationally. Overall, this can be attributed to a number of factors: strong online sales during the quarantine period; a surge in consumer confidence as retail outlets re-opened; the opening of the second Kcell/Samsung store in September; and a further boost from sales of the latest Samsung smartphone and the iPhone 12. Our endeavours to refocus our B2B portfolio during 2020, removing unprofitable products and introducing more innovative propositions for our corporate customers, also proved successful. Full details are included in the CEO's review on pages 16 to 17.

"Against this difficult economic backdrop, I am particularly pleased that Kcell is able to report a robust performance, both financially and operationally."

Alexey Buyanov
Chairman of the Board of Directors

Operational synergies with Kazakhtelecom

Despite the ongoing pandemic, we made it a strategic imperative to exploit the synergies between our major shareholder Kazakhtelecom and Kcell during 2020. It was already clear that achieving efficiencies would enable us both to gain competitive advantage and, indeed, we launched our first joint product initiative to deliver fixed and mobile convergent services.

The integration of the companies radio networks projects with our majority shareholder Kazakhtelecom which started in Q3 of 2020 aimed to leverage operational synergies. The implementation of this collaborative project is progressing well and already providing a significant improvement in data transmission speed and absolute network coverage in comparison with competitors. 263 sites in 17 cities across Kazakhstan were merged in 2020. We are already seeing significant improvement in data transfer speed and in network coverage compared to our competitors.

Project 250+ participation

As part of Digital Kazakhstan, the country's ambitious drive to provide digital access to all its citizens, Project 250+ is an initiative that aims to deliver high-speed internet access to rural communities with populations of 250 or more. Kcell was proud to be invited, along with Kazakhstan's two other mobile providers, to supply 3G and 4G connectivity to 1,600 rural settlements with a combined population of 1 million. Through a network sharing programme, this will enable access to educational, telemedicine and mobile financial services as well as government digital resources.

Kcell's termination of GDRs programme

The Board has given serious consideration to a request by the Company's majority shareholder, Kazakhtelecom, to delist its GDRs from both the London Stock Exchange (LSE) and the Astana International Exchange (AIX). It has concluded that the low liquidity and poor trading performance of the GDRs do not warrant the costs and management effort required to maintain the Company's status as an internationally listed company. The ordinary shares of the Company will continue to be listed on the Kazakhstan Stock Exchange ("KASE") and on AIX following the termination of the Deposit Agreement and the GDR programme. The management believes that concentrating trading on KASE will improve liquidity. It also feels that the costs and efforts of maintaining an international listing are no longer justifiable, since there are no plans to access international capital markets. The EGM hold on 9 April 2021, approved the termination of the GDR programme, delisting of securities and termination of the Deposit Agreement. The Deposit Agreement and the GDR programme would terminate on 12 June 2021.

In December 2020, Chairman of the Management Board, CEO, Kaspar Kukelis left the post to take up another position in the Kazakhtelecom JSC group of companies. During his tenure, Kcell was able to achieve significant improvement in key financial and operational indicators. Along with the Board of Directors, I would like to thank him for his contribution and to wish him every success for the future. We have now appointed Yuri Kharlamov as Chairman of the Management Board, CEO. Yuri joined Kcell nearly a year ago as Chief Financial Officer and we have every confidence in his ability to lead the Company on a further upward trajectory through effective operational performance and continuity of the Company's strategy.

Q&A WITH OUR CEO

Delivering strong performance

Q How would you summarise the overall performance of the Kcell business in 2020 and the factors that have driven this, in particular the strong uplift in figures during the last quarter?

A Total revenue in 2020 increased by 11.5%, to KZT174,684 million (2019: KZT156,657 million). Service revenue rose to KZT140,049 million (2019: KZT137,564 million), up 1.8% year-on-year and 3.8% increase excluding off-net bulk SMS revenue. We saw an underlying increase in service revenue, driven mainly by a rise in subscribers for our innovative, high quality tariff plans and robust handset sales, supported by strong sales through online sales channels.

During the year, EBITDA, excluding non-recurring items, grew by 12.1% to KZT72,147 million (2019: KZT64,364 million), due to strong revenue growth allied with our ongoing focus on cost optimisation.

Free cash flow for 2020 increased by 31.1% to KZT28,705 million (2019: KZT21,900 million). We have also improved the terms of our debt portfolio during the year. Generated cash flow will be used for financing our capital intensive projects.

Q What actions were taken by the Company that you think would account for the strong rise in service revenue, particularly during the last quarter?

A Service revenues also benefited from our strong focus on customers' needs, as demonstrated by the introduction of innovative tariffs, such as Reactiv, new streaming film and television services (OTT) and mobile financial services products along with the rollout of apps that allow customers to manage their accounts according to their own particular requirements. As a result, average revenue per user (ARPU) increased by 9.3% year-on-year.

Q Handset sales have become part of your broader offering to meet your customers' needs in recent years. How successful was this in 2020?

A Handset sales increased significantly in 2020. We have successfully opened two co-branded stores with Samsung; its new models are very popular with our customers. In addition, in Q4, sales were further driven by the launch of the iPhone 12 leading to an increase in Kcell's entire market share for handsets and devices. We also experienced an increased demand for devices during the pandemic lockdown. This was both to enable B2B customers to work efficiently from home and also, as part of our involvement with the Ministry of Education, supplying devices for online learning. Overall, in 2020 handset and device sales increased to KZT34,634 million (2019: KZT19,091 million), up 81.4% year-on-year.

> **Kcell has delivered a strong financial and operational performance in 2020, in the face of the significant challenges resulting from the COVID-19 global pandemic and its impact on the level and scale of business activity in Kazakhstan."**

Yuri Kharlamov
Chairman of the Management Board, CEO

Q What has been your approach for B2B customers during the last year?

A In B2B, we focused in 2020 on rebalancing the portfolio to remove unprofitable products such as off-net bulk SMS, while developing new propositions including virtual office services. This resulted in 28.5% growth, excluding off-net bulk SMS revenue in 2020.

Q Are there any particular projects that you would like to highlight in 2020?

A We have made great progress in advancing connectivity across the country through our participation in the '250+' project, which targets the achievement of a high level of digitalisation throughout Kazakhstan, by bringing access to high-speed Internet to villages with 250+ population.

The '250+ project, a joint initiative by Kazakhstan's three mobile operators, is part of the Digital Kazakhstan programme and aims to bring connectivity to 1,600 rural settlements across the entire country. This initiative will benefit more than 1 million people and ensure that all citizens have access to modern online services, including business, education, health and entertainment, by the end of 2021, which significantly marks the 30th anniversary of Kazakhstan's independence.

This partnership between Kazakhstan's three mobile operators to deliver this ambitious project will additionally ensure that overall costs are contained while greatly improving connectivity; thus providing widespread economic and social benefits. Also we are making good progress with instigating collaborative projects with our majority shareholder Kazakhtelecom to leverage operational synergies.

Q How do you propose sustaining your position in today's very competitive market?

A Towards the end of the year, we started a project to improve the efficiency of the commercial function aimed at enhancing the customer experience and accelerating the process of launching new products and services. We plan to extend this to value-added services, OTT and mobile financial services, improving the mobile application and developing online sales and customer service channels

Q The COVID-19 pandemic has impacted business across Kazakhstan during 2020. How has Kcell managed the situation?

A Throughout the year, we have played an active role in providing crucial support to both our customers and the wider society in Kazakhstan, enabling the continuation of business, education and crucial channels of communication during an extremely difficult period for our economy and society. We did this by providing the tools that our customers needed as both we all grappled with the personal and professional challenges created by the pandemic quarantine.

Kcell introduced free calls and internet traffic for medical professionals. We also gave all our customers free access to more than 400 e-learning web sites, to online books, movies and TV entertainment as well as mobile applications for online banking services. In addition, we have granted bonus minutes and free roaming data to those subscribers who were unable to return to Kazakhstan as a result of this state of emergency. We also provided uninterrupted mobile service if subscribers' balance reached zero. During quarantine in Kazakhstan, we urged our customers to remain home by displaying the slogan UYDEBOL ("stay home" in Kazakh) on handsets. Our initiatives were clearly communicated across all digital touchpoints, emphasising our overarching message "Stay home, Kcell is at your service".

Q What are your thoughts about any ongoing implications for 2021?

A With signs that the situation in Kazakhstan is gradually stabilising, and on the basis that nothing untoward occurs to undermine this stability, the Company outlook for 2021 is for high single-digit growth in both revenue and EBITDA. The CAPEX projection will be provided upon completion of the second planning stage for the radio access networks integration project with the Kazakhtelecom group of companies.

Every member of the Kcell team has demonstrated outstanding resilience and commitment in the face of the challenges presented by COVID-19. As a result, we continue to deliver technology and service excellence to support our customers, as well as the wider economy and society. And, we are well positioned to provide value to all our stakeholders in the year ahead.

OUR BUSINESS MODEL

Kcell's business model is built upon sound foundations and at the core of its success. By exploiting its strong asset base and differentiators through 21st-century solutions, Kcell seeks to generate superior value for all its stakeholders.

Our inputs

People

Kcell recognises the value of recruiting, developing and retaining talented people, and aims to be an employer of choice in Kazakhstan by creating a positive and motivating work environment, as well as improving the quality of life for employees and their families.

Technology

Kcell has become Kazakhstan's largest digital ecosystem and enjoys a competitive edge through such value-added content as mobile financial services, mobile television, movies, books, music and magazines, as well as the development of unique business solutions for corporate clients.

Network

The Company operates one of the most modern, technologically advanced and extensive mobile telecommunication networks in the country, and has licences to operate on 2G, 3G and 4G/LTE frequencies indefinitely.

Brands

The Kcell and Activ brands are well established in the highly competitive B2B and B2C telecommunications markets and recognised for their quality of customer experience and value.

Financial position

Service revenues benefitted from strong focus on customers' needs, as demonstrated by the introduction of innovative tariffs, new OTT and mobile financial services products. Kcell's higher share of revenues from B2B and handset sales, together with a consistent focus on optimising costs, is helping to strengthen the Company's financial position.

Natural resources

We care about the environment in which we operate, contributing to local and global sustainability by developing, promoting and utilising resource-efficient and environmentally friendly services, and by seeking to reduce our environmental footprint.

Operating model

The digital transformation of our operations is progressing well. Our commitment to innovation and value is central to this and enables us to deliver 21st century solutions to our customers. We achieve this through the quality of our fast-expanding network, competitive brands in the market place and data-centric products and services, as well as the support of our dedicated employees.

Customer-oriented solutions

Value for money

What makes us different

Network quality

With our high-quality 4G/LTE network, we continue to lead the advancement of mobile telecommunications in Kazakhstan and look forward to introducing the next generation, 5G.

Innovation

We invest in innovative products and services, and developing digital content; in 2017, we opened an innovation lab to work on 'internet of things' (IoT) services.

Strategy
The Company's strategy is to retain a market-leading position and to unlock synergies with Kazakhtelecom.

See page 22

Sustainability
Investments in sustainability play a crucial role in ensuring that the business model will endure and in benefiting society as a whole.

See page 32

Risk management
We have implemented a robust risk management system to identify and mitigate risks to our operations and ensure that our business functions without disruption.

See page 36

Governance
By adhering to the highest standards of ethical conduct with all our stakeholders, we seek to contribute to and promote an enduring culture of responsible business.

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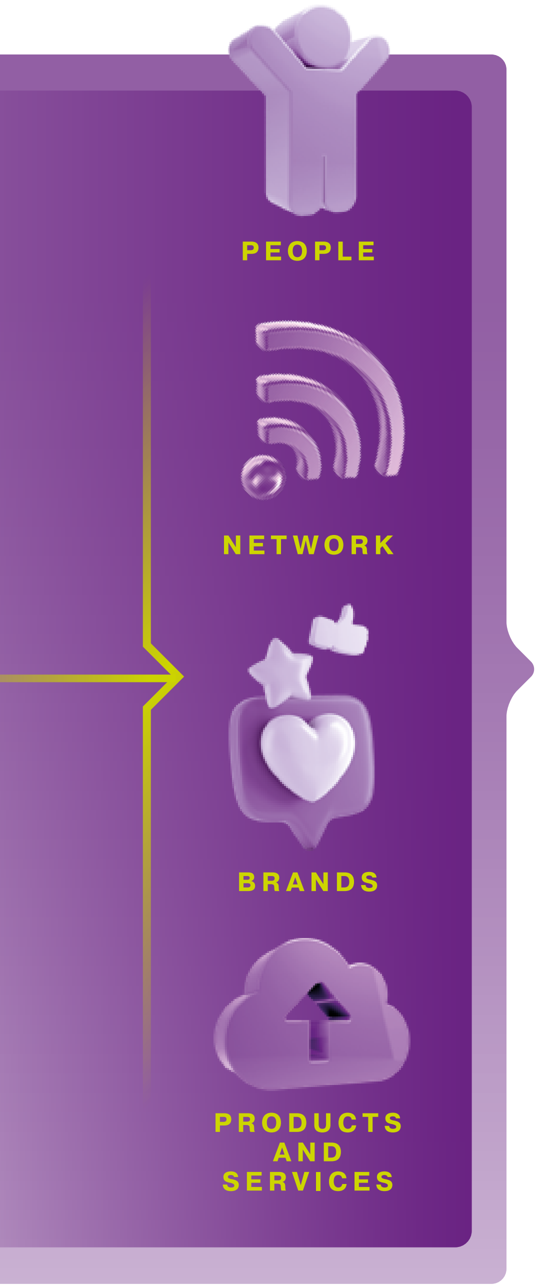

Values created for

Customers
Kcell provides the full spectrum of mobile telecommunications services to both individuals and organisations, underpinned by data-centric products and services that add high value for digital customers.

Subscribers

8.1m

Shareholders
The Company remains steadfastly committed to maximising value for shareholders in a way that is sustainable for the long term, including through its clearly defined dividend policy.

Dividend paid to shareholders

KZT 9bn[1]

1 For 2019.

Employees
Kcell has 2,249 employees with remuneration packages, which reflect internal equity and external local market conditions, and offers comprehensive benefits.

Employees

+15.3%

Community
We are actively involved in many initiatives that aim to improve the lives of people, focusing on three key areas: education, sport and healthy lifestyles, and society.

Community investments

KZT 323m

commitment to Kcell employees during the pandemic, supporting employees and their families

Expertise
From the engineers that build our networks to the operators in our call centres, we employ a dedicated workforce who have the skills to deliver a first-class service to our customers.

Customer relationships
Our focus is on customer value management through the application of smart pricing methods and the use of targeted promotional activities.

Brand reputation
As one of Kazakhstan's leading companies, Kcell takes very seriously its responsibility to the communities in which it operates, supporting them through its people and its business.

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The changing face of the industry

While 2020 was the year when the coronavirus pandemic dominated world news, it will have a much longer lasting impact on the global economy, and the telecommunications sector is not immune to this. Service providers are more likely to experience difficulties in securing finance to progress infrastructure and service development as the uncertainties of the economic slowdown persist.

The global telecom market

This also means that plans to accelerate the availability of premium products and services such as 5G and fibre optics could be severely hampered.

However, it is not all gloom and doom as it is predicted that the trend for growth seen within the global telecom market over recent years will continue. The face of the industry is changing yet again as new technologies push the boundaries: mobile connectivity is outperforming fixed-line and fixed-voice connections in particular. In fact, the ever-increasing penetration of internet services through both wireless or copper-laid networks is fast replacing fixed-voice traffic altogether.

Although it is a later adopter than many developed markets, the CIS region is experiencing a rapid uplift in mobile broadband and 4G became the leading technology in the region during 2020. Greater use of data-intensive services and the demand for higher speeds will see this increase further with the prediction that 4G will account for nearly two-thirds of the region's total connections by 2025.

The latest figures for the industry show that, in 2019, mobile technologies and services generated 6.1% of GDP in the CIS region, which equates to a value-added contribution of US$137 billion. With 5G technologies becoming more widespread – 50 million 5G connections estimated by 2025 – the boost to the CIS economy will be significant, as key sectors such as manufacturing, utilities and professional and financial services reap the benefits of better and faster connectivity.

Focusing on Kazakhstan

A general overview of the Kazakhstan telecom market shows a consistent growth in recent years, which is expected to continue. This is mainly attributed to the rise in urban populations across the country and the subsequent increase in the adoption of mobile phones, which support 3G, 4G and planned 5G services. Global Monitor predicts further strong growth in the telecom market until 2025, influenced in particular by the Internet of Things (IoT) as it connects devices across wired and wireless broadband.

2G platforms are gradually being withdrawn and will largely have disappeared by 2025, with 3G networks also being reduced as consumer demand for improved connectivity becomes the key driver to providing better access. Mobile subscriptions are forecast to increase by 72% from 2019-2025 with smartphones up by 86% and mobile internet users by 54%. It is estimated that, by then, 3G will only account for 28% of the market with 4G taking the lion's share at 60% and 5G already cornering 12% overall. From its much-anticipated launch during 2021, it is likely that the vast majority of mobile connections will already be on 5G by 2029.

Much of this will be fuelled by an ambitious programme, Digital Kazakhstan, drawn up by the Government of Kazakhstan in order to improve the country's ranking in the global information and communication technology (ICT) Development Index. The most recent listing in 2017 ranked the country in 52nd place: the target is to be one of the top 30 countries. Taking just one indicator of the progress being made, the share of internet users in 2020 in Kazakhstan had increased to 88% from 84.2% in 2019.

2020 was also the start of a major initiative, the 250+ programme, which aims to bring high-speed internet access to rural settlements with more than 250 inhabitants. All three of Kasakhstan's mobile operators have signed up to delivering connectivity to 1,600 villages across the country, reaching over 1 million people. The partnership agreement will contain costs while, at the same time, increasing access to business, education, health and entertainment services by the end of 2021, which is also the 30th anniversary of Kazakhstan's independence.

The Government has also signed up to an initiative, led jointly by UNICEF and the UN's International Telecommunication Union. Built on the four pillars of Map, Connect, Finance, and Empower, Giga aims to connect every school in the world to the internet and every student to information, opportunity and choice by 2030.

2020 activity and COVID-19

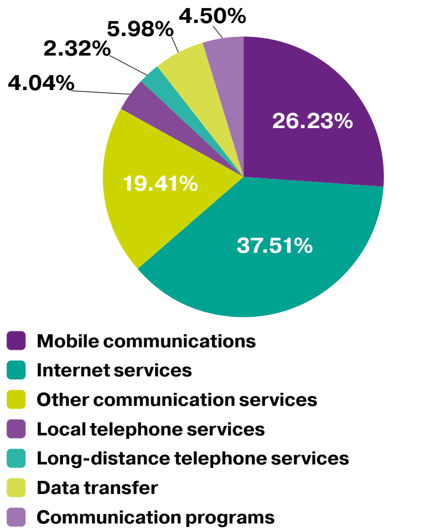
The telecom market remains highly competitive with only three major mobile operators: Kcell, Beeline and Tele2/Altel. The focus for all three continues to be the introduction of new and affordable products and services, along with the expansion of networks and bandwidth. Innovation is key to driving revenue from both mass-market entertainment and high-end business connectivity.

With the safety of employees paramount during the COVID-19 pandemic, the telecom industry in Kazakhstan experienced its impact in a number of ways. The state of emergency lockdowns, with remote working and home schooling, inevitably brought with it increased revenues through the streaming of educational and entertainment services. Capital expenditure on infrastructure, on the other hand, decreased as companies were forced to slow network deployments to ensure the health and safety of their engineers.

Compared to many sectors of the Kazakh economy, the overall communications industry performed well with an 8.6% increase in revenue year-on-year at KZT884.5 billion. Much of this is attributable to a 14.4% rise in revenue from internet service at KZT33.1 billion; voice service accounted for KZT231.3 billion, up slightly by 1.5%; while local telephone services were down 2.6% to KZT35.8 billion. In terms of volume, the Internet, mobile communications and other telecommunication services accounted for 83% of the market.

The COVID-19 response by the country's mobile operators to introduce measures to support their customers throughout a difficult year was exemplary. Measures included free access to educational services and to government websites and banking services, free or discounted tariffs for healthcare workers, online conferencing solutions to support business continuity and economic recovery. They also engaged with both public and private sectors on initiatives to alleviate the impact on vulnerable groups in society.

Structure of telecommunications services revenues in Kazakhstan in 2020



Source ©Profit KS

More information about Kcell's performance and its own response to the COVID-19 pandemic can be found throughout this Annual Report.

Sources:

Global Monitor: www.globalmonitor.us/product/kazakhstan-telecommunication-market-report

GSMA: www.gmsa.com The Mobile Economy Russia & CIS 2020

www.profit.kz

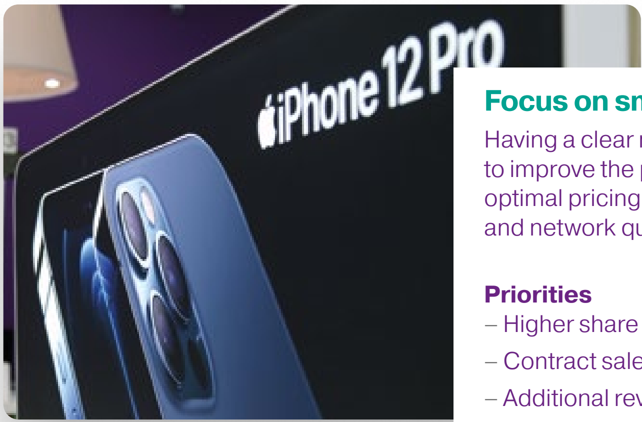
OUR STRATEGY

Kcell is at your service

Our support for subscribers and clients during the state of emergency also reinforced our strategies for growth and innovation across the business.

In smartphones

#1



+81.4%

increase in handset sales

+9.3%

ARPU growth

Focus on smartphone users

Having a clear multi-brand architecture will enable Kcell to improve the performance of its B2C business through optimal pricing for bundles, customer value management and network quality.

Priorities

- Higher share and ARPU of bundled offer users
- Contract sales growth
- Additional revenues from digital services

Performance in 2020

- Revenue growth driven by a rise in subscribers for high quality attractive tariff plans which include variety of additional services (ivi TV, Yandex+, Mobi Doctor, educational platforms, cash back)
- Systematic growth in the penetration of package offers is due to:
  - Active promotion of new offers across all channels
  - Launch of innovative and attractive service packages
  - Introduction of a new 'Reactiv' tariff line with unlimited Internet access
  - Launch of an internet shop for online sales
  - Opening of 2 co-branded shops in partnership with Samsung
  - Significant increase in 4G penetration due to record handset sales and new Apple and Samsung smartphones

Key performance indicators

See page 25

In B2B

#1

Web conferencing service launched

Sustainable growth through diversification

In 2020, we focused on rebalancing the B2B portfolio by removing unprofitable products, such as off-net bulk sms, whilst developing new propositions including virtual office services and private LTE networks. The development of these innovative, new products will attract additional revenue streams and secure annual growth.

Priorities

– Active participation in the Digital Kazakhstan projects
– Leadership and intensive growth in large business through business solutions
– Extensive SME growth through digital solutions and automation
– Development of new business areas (Big Data, IoT, etc)

Performance in 2020

– Growth of 28.5% year-on-year, excluding off net bulk sms
– Launch of an electronic ticketing system to supply fare validation and payment terminals for public transport
– Completion of the construction and launch of the first commercial Private LTE in Kazakhstan and one of the first in the CIS
– Introduction of a voice and video communication system (mission critical push-to-talk)
– IoT solutions are under development and piloting

Key performance indicators

See page 24

Group synergies

Product convergence and network integration

Additional synergies can be achieved through numerous products and cost optimisation. There is potential from existing offerings such as fixed-mobile convergence (FMC) in the B2C segment and fiscal data, as well as in new areas, such as FMC in the B2B segment, B2G and Digital Kazakhstan.

Priorities

– New revenues from FMC in the mass segment
– Converged digital services for business
– Other commercial synergies

Performance in 2020

– The first phase of integration of Kcell and Kazakhtelecom's radio networks
– Launch of the first joint product initiative with Kazakhtelecom to deliver fixed and mobile convergent services

Key performance indicators

See page 24

263

sites merged in 17 cities

KEY PERFORMANCE INDICATORS

Showing strength and leadership

Despite a difficult trading year, Kcell delivered both strong financial and operational results in 2020, in line with its provided outlook.

Financial indicators

Total revenue (KZT million)

174,684

2020	174,684
2019	156,657
2018	149,701

Total revenue increased by 11.5%, driven by attractive new tariff plans, an increase in customers with bundled offers and higher sales of devices in B2C and B2B segments.

EBITDA* (KZT million)

72,147

* excluding non-recurring items

2020	72,147
2019	64,364
2018	50,941

EBITDA growth was 12.1%, mainly driven by higher device sales, termination of provision of low margin services and substantial cost optimisation, with a 41.3% margin.

Net income (KZT million)

17,578

2020	17,578
2019	10,015
2018	8,531

Net income, reflecting the same key drivers as EBITDA and supported by thorough analysis and tight control of expenses, increased by 75.5%.

B2B revenues (KZT million)

20,139

2020	20,139
2019	18,616
2018	16,021

A strong B2B performance delivered 28.5%, excluding off-net bulk sms revenue, due to the focus on rebalancing the portfolio and developing new propositions.

Data revenues (KZT million)

58,446

2020	58,446
2019	51,430
2018	45,800

Data revenue increased by 13.6%; data traffic was up by 40.6% to 453.4 PB. Our bundled base grew by 8.1pp during the year, while 4G device penetration increased by 7.5pp during the year due to record handset sales and new smartphones from Apple and Samsung.

Service revenues (KZT million)

140,049

2020	140,049
2019	137,564
2018	131,269

Service revenue increased by 1.8%; excluding off-net bulk sms, service revenue grew by 3.8%. This growth was driven by a rise in subscribers for high-quality, attractive tariff plans, which include a variety of additional services such as: ivi TV, Yandex+, Mobi Doctor, educational platforms, cash back.

Operational indicators

Total subscribers ('000)

8,055

2020	8,055
2019	8,275
2018	8,969

While the total number of subscribers fell by 2.7%, the take-up of high-quality tariff plans rose in line with the move to value-driven acquisition.

Minutes of usage (MOU; units)

230

2020	230
2019	228
2018	218

MOU remained largely unchanged during 2020, in keeping with the trend seen in recent years.

Churn (%)

34.1

2020	34.1
2019	44.5
2018	55.5

Churn again fell considerably to 34.1% as Kcell continued to implement its strategy of moving from volume-driven to value-driven subscriber acquisition.

Prepaid subscribers ('000)

7,061

2020	7,061
2019	7,312
2018	8,062

The drop in prepaid subscribers of 3.4% is also in line with Company's strategy to move from a subscriber base that is volume-driven to one that is value-driven.

Average revenues per user (ARPU; KZT)

1,457

2020	1,457
2019	1,334
2018	1,154

ARPU grew by 9.3%, boosted by the improved quality of our subscriber base with a growing number migrating to new offers with expanded content. This also included a higher number of subscribers with fixed contracts, due to the increasing volume of devices sold through our online shops.

Handset sales (KZT million)

34,634

2020	34,634
2019	19,091
2018	18,432

Handset revenue increased significantly by 81.4%, fuelled by online sales, the opening of a second co-branded Samsung store and the launch of the iPhone 12.

Ensuring crucial support for our customers throughout the year

2020 was a changeable year for our B2C business. The full realisation about the impact of the COVID-19 pandemic become clearer as we moved into Q2. The national lockdown resulted in lower consumer spending and an increase in personal saving. Job losses and uncertainty about the future were also factors in the decline in the number of active subscribers in the Kcell network and reduced top-up payments.

Inevitably, upselling to new – more attractive but more expensive – tariff plans also slowed, while global travel bans brought a substantial reduction in roaming revenue.

However, we believed that it was crucial to support our customers through this difficult period, making sure that all channels of communications were able to continue uninterrupted. During quarantine in Kazakhstan and in line with the national guidelines, we promoted the slogan, UYDEBOL ("stay home" in Kazakh), on handsets. We introduced free calls and internet traffic for medical professionals, while giving all our customers free access to more than 400 e-learning web sites, to online books, movies and TV entertainment and online banking services. In addition, we have granted bonus minutes and free roaming data to subscribers who were unable to return to Kazakhstan as a result of the state of emergency. We also provided uninterrupted mobile service if subscribers' balance reached zero. All these initiatives were communicated across all digital touchpoints, clearly emphasising our overarching message "Stay home, Kcell is at your service".

A slowing in the spread of the pandemic and a lifting of restrictions towards the end of the year also brought with it an increase in consumer confidence as evidenced by the growth in service revenue (excluding off-net bulk sms), which was up 3.8% year-on-year. This was driven in part by our focus on customer needs and the introduction of innovative tariffs, such as Reactiv, new OTT and mobile financial services products, but robust handset sales (particularly online) sales also contributed to this. Average revenue per user (ARPU) during the year grew by 9.3%.

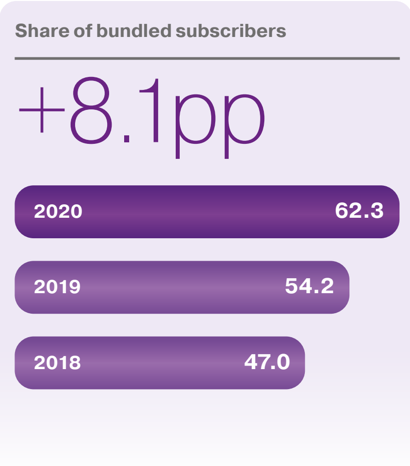
SuperApp launch

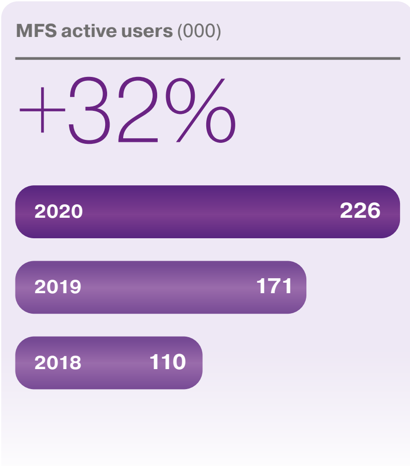
We launched a beta version of updated mobile applications and websites to provide our customers with a more consistent and user-friendly access to Kcell's services. This SuperApp 'ecosystem' brings together a number of integrated products: core/VAS/OTT; MFS; online shop; subscriber self-service (robot consultant, WhatsApp and Telegram bots, free SMS to 9090).

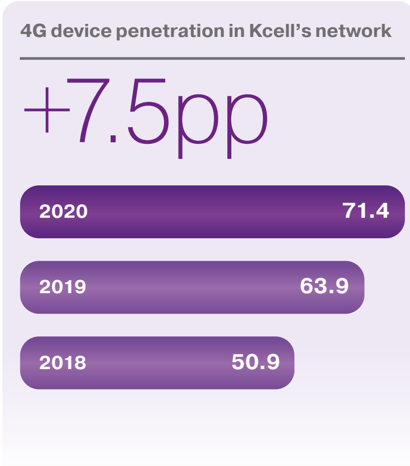
Non-cash payments and QR

Payments made by the Kcell/Activ subscribers using their prepaid balance doubled in 2020 compared with 2019. As elsewhere in the world, the growth of non-cash payments in mobile commerce has largely been driven by two factors: the pandemic and an improvement in user interfaces.

During the lockdown period, online shopping and payments made via the internet increased significantly. In Kazakhstan, according to the players in the mobile commerce market, from January to April 2020, the volume of non-cash transactions increased by more than 2.5 times to KZT 7.4 trillion (2019: KZT 2.8 trillion). But, it is also important to see this in the context of how quickly consumers have embraced the move towards a cashless society: as recently as five years ago, annual non-cash transactions only accounted for KZT 234.3 billion of overall payments.







It is predicted that, during 2021, QR payments will grow dynamically. Although available since 2017, consumers had been slow to adopt this payment option, despite its obvious advantages of lower commission and safer transactions. But 2020 changed all that with the banks in Kazakhstan actively promoting QR payments and generally raising public awareness.

TapOnPhone+QR technology using international unified standards has a major part to play in the near-future of mobile commerce and will require an ecosystem for payments using mobile phone balances. Kcell has already invested in this and is ahead of the curve with the launch of its 'Cash back with Visa QR' campaign. It is the only mobile operator in Kazakhstan providing contactless payments services using QR code in the Visa QR network around the world.

Retail and online handset sales

The lifting of quarantine and the loosening of the tight restrictions governing the opening of offices and stores unleashed a pent-up demand from consumers for handsets and devices. This helped to generate a significant increase in sales, up 81.4% year-on-year at KZT 34,634 million.

The increase was also partially driven by higher sales through online channels. Alongside this, revenue was further enhanced by improved inventory management processes, which enabled the Company to handle and meet demand effectively, combined with careful price monitoring.

MobiDoctor

Revenue growth was partially driven by a rise in subscribers for high-quality and attractive tariff plans, which included variety of additional services (ivi cinema, Yandex+ music streaming and other benefits, educational platforms). Telemedicine has become an increasingly important element within digital offers and, with the spread of COVID-19 and quarantine measures, the demand for such services grew significantly during 2020.

In response to this and collaborating with IMEDICUS, Kcell launched the MobiDoctor online consultation service. Included in the Jańa 3990 tariff plans, MobiDoctor allows Activ subscribers to received an unlimited number of online medical consultations from a doctor on duty or a paediatrician at any time of the day or night, seven days a week, anywhere in the world. As predicted, the take-up for this service has grown exponentially since the launch as subscribers were keen to take advantage of this innovative new service.

Simkomat self-service kiosks

During April, we introduced the first of our Activ Simkomats in Almaty. These self-service kiosks allow customers to easily purchase, replace a lost SIM-card, install an eSIM or top up their balance. Given the state of emergency, these were a real boon for those wishing to access cellular services in a safe and efficient way. They have already proved popular and have now been installed across Kazakhstan with plans to increase their numbers in the coming year.

The Simkomat was developed by a team designers, product specialists and developers with the aim of increasing digitalisation and improving the user experience. This will also reduce costs and contribute to the future expansion of the network.

ivi cinema

ivi cinema is another premium service that Kcell is now offering as part of the Jańa 3990 tariff for Activ subscribers. With no additional fees and unlimited access without adverse image quality and all online advertising blocked, subscribers are able to watch more than 80,000 films and TV series on ivi cinema. This proved most popular with subscribers during lockdown and quarantine, when broadening the scope of home entertainment was particularly welcome.

A change in focus contributed to increased B2B sales

In B2B, our focus during 2020 was on rebalancing the portfolio to remove unprofitable products, such as off-net bulk sms, whilst developing new propositions including virtual office services. This resulted in 28.5% growth year-on-year, excluding off-net bulk sms revenue.

While our change in focus and attractive new services contributed to the significant increase in B2B sales, this was also boosted by the demand for devices and connection accessories as the pandemic restrictions forced citizens across Kazakhstan to work remotely from home. We have created and delivered a range of packages specifically designed at facilitating work from home and network connectivity to meet the changing needs of Kazakh people. We were also pleased to be able to offer our support and work with the Ministry of Education to provide devices and tools to enable schooling to continue online.

Mobile workplace

Kcell's aim is always to help clients solve their business problems and 2020 was no different despite the ever-changing nature of the challenges that it threw at the Company. Adapting quickly to new realities and utilising the latest innovations were key to enabling the Kazakh people to work and study remotely without any problems with connectivity. Where teleworking had previously been something of a novelty for the vast majority of businesses, it now became a necessity along with the application of the most modern technologies.

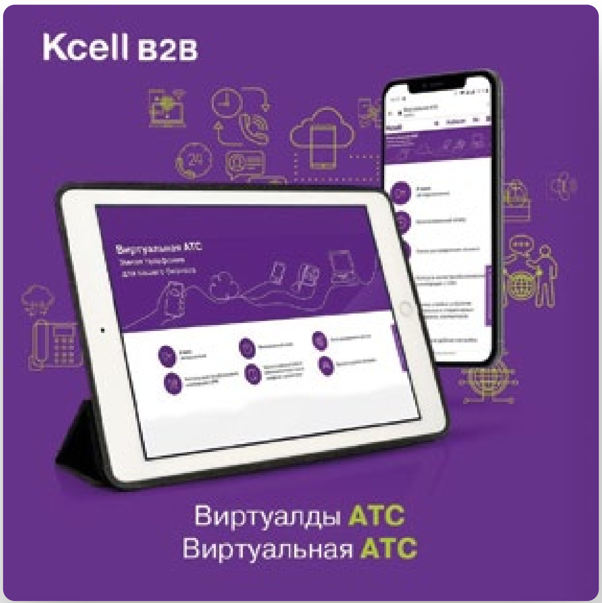
In July 2020, this prompted us to launch a web conferencing service, based on the Cisco Meeting Server platform and offering a secure solution via Kcell's server facilities to minimise the risk of data hacking. And, although this was initiated because of the COVID-19 situation, we see this as very much part of our future product offering in the 'new normal' marketplace.

Internet of things (IoT)

The Internet of Things (IoT), once the domain of science fiction fantasy, is now part of everyday life from the ability to monitor your household appliances at a distance on your phone to inbuilt sensors that tell you when your car needs a service or the oil changing. IoT is expanding into almost every aspect of modern living. During 2020, due to the coronavirus pandemic, there was a slight slowdown in growth in this area. However, analysts predict that the Kazakh IoT market is set to grow exponentially by at least 15% per annum with the market to be more evenly distributed than at present. The 'smart' city and home has been the major focus to date but the use of IoT in agriculture, transport and logistics is becoming more commonplace. And, in recent years, Kcell has significantly increased the solutions that it offers based on IoT technology.

Vehicle tracking A GPS tracker installed on a vehicle collects data on the location and speed of the vehicle, and sending it to a client's platform via Kcell's cellular network. This service enables companies to optimise logistics processes, track vehicle routes in real time, monitor fuel consumption, track cargo and minimise the risk of damage and theft, alert warehouse personnel on deliveries and can also provide accurate information in the event of an accident.

Smart city A manhole monitoring system proposed by Kcell monitors the maintenance of wells, preventing any unauthorised opening, which could threaten the safety of citizens, as well reducing vandalism.



Retail and FMCG With food products very sensitive to storage conditions, temperature and humidity, writing off products due to any disruption in storage conditions is both problematic and unprofitable for retail chains. Kcell offers its customers solutions include that include sensors, IoT devices, server software and user interfaces that records and transfers data on storage conditions in order to minimise such events.

Agriculture Kcell is part of the implementation of the Kazakh Government's 250+ programme that will provide broadband mobile Internet to rural settlements with populations of over 250 people. By the end of 2021, 1,600 Kazakh villages will not only have online access to online business, education, health and entertainment services but will also have the connectivity to use IoT technologies to monitor the status of livestock and control the operation of agricultural machinery and vehicles.

Halyk Bank and Kcell pandemic partnership

As part of its support for its citizens during the pandemic, the Kazakh Government announced the payment of KZT 42,500 social allowance for many employees and self-employed workers. Halyk Bank is one of the main operators for state payments and its call centre experienced a five-fold increase to 4.5 million calls per month as people contacted them to apply for the allowance or check on their eligibility.

During the state of emergency, Halyk Bank operated its call centre 24/7 and more than doubled staffing levels. Kcell also stepped up and offered several solutions to help with the situation. The two organisations joined forces, recalling employees who were on leave due to COVID-19, with some 110 Kcell employees trained to help with the social allowance calls as part of a joint team of over 500.

On the technical side, Kcell arranged the infrastructure needed to handle the volume of calls and the Business Solutions department developed (in 16 hours) a Telegram bot for Halyk Bank that would transfer customer calls to automatic online service channels. With these alternative portals, customers were able to find all the necessary information on social payments, apply for bank loan deferral, get the service online and much more.

The partnership between the two companies demonstrated that Kazakh businesses can easily navigate the new reality. By working flexibly and co-operating with one another, Kcell and Halyk Bank were able to provide vital support for their clients.

Private LTE

In 2020, Kcell completed the construction and launch of one the first commercial Private LTE in the CIS. This encompasses autonomous networks for digitalising the mining industry and enabling the automation of mining and processing procedures. In turn, this will both help drive efficiency and help prevent production accidents. Working in partnership with mining companies, the Company has gained invaluable experience from this initial project and can see major potential in approaching other B2B customers with this proposition.

FINANCIAL REVIEW

Delivering another year of strong performance

Kcell delivered a strong financial performance in 2020, despite the significant challenges resulting from the COVID-19 global pandemic and its impact on business activity in Kazakhstan. Total revenue in 2020 was up by 11.5% and EBITDA, excluding non-recurring items, grew by 12.1%.

Financial highlights

- Net sales up 11.5% to KZT174,684 million (2019: KZT156,657 million). Service revenue increased by 1.8% to KZT140,049 million (2019: KZT137,564 million); service revenue excluding off-net bulk SMS grew by 3.8%.
- EBITDA, excluding non-recurring items, increased by 12.1% to KZT72,147 million (2019: KZT64,364 million). EBITDA margin was 41.3% (2019: 41.1%).
- Operating income, excluding non-recurring items, up 22.6% to KZT41,283 million (2019: KZT33,661 million).
- Net finance cost decreased by 9.8% to KZT9,453 million (2019: KZT10,479 million).
- Net income increased by 75.5% to KZT17,578 million (2019: KZT10,015 million).
- CAPEX-to-sales ratio of 15.4% (2019: 12.9%).
- Free cash flow increased by 31.1% KZT28,705 million (2019: KZT21,900 million).
- The number of subscribers totalled 8,055 thousand (2019: 8,275 thousand).

KZT in millions, except key ratios, per share data and changes	2020	2019*	Change %
Net sales	174,684	156,657	11.5
of which service revenues	140,049	137,564	1.8
EBITDA, excluding non-recurring items	72,147	64,364	12.1
Margin (%)	41.3	41.1	
Operating income, excluding non-recurring items	41,283	33,661	22.6
Net income	17,578	10,015	75.5
Earnings per share (KZT)	87.9	50.1	75.5
CAPEX-to-sales (%)	15.4	12.9	
Free cash flow	28,705	21,900	31.1

* The Company has adopted IFRS Interpretations Committee's agenda decision on cancellable or renewable leases, and related non-removable leasehold improvements and restated comparative financial statement.

Revenues

Net sales

Net sales were 11.5% higher year-on-year and amounted to KZT174,684 million (2019: KZT156,657 million).

Service revenue increased by 1.8% to KZT140,049 million (2019: KZT137,564 million); service revenue excluding off-net bulk SMS increased by 3.8%.

Enterprise revenue, excluding off-net bulk SMS, was up 28.5% to KZT18,730 million (2019: KZT14,581 million).

Voice and other services

Revenue from voice and other services decreased by 6.1% to KZT73,851 million (2019: KZT78,689 million).

Data service revenue
Data revenue increased by 13.6% to KZT58,446 million (2019: KZT51,430 million). Data traffic grew by 40.6% to 453.4 PB (2019: 322.5 PB).

Value-added service revenue
Revenue from value-added services increased by 4.1% to KZT7,752 million (2019: KZT7,447 million).

Handset sales
Handset sales increased by 81.4% to KZT34,634 million (2019: KZT19,091 million).

Breakdown of revenues

KZT in millions, except percentages	2020	% of total	2019	% of total
Voice and other services	73,851	42.3	78,689	50.2
Data services	58,446	33.5	51,430	32.8
Value-added services	7,752	4.4	7,447	4.8
Handset sales	34,634	19.8	19,091	12.2
Total revenues	174,684	100.0	156,657	100.0

Expenses

Cost of sales
Cost of sales up by 9.4% to KZT119,133 million (2019: KZT108,928 million), largely as a result of higher sales of devices.

Selling and marketing expenses
Selling and marketing expenses were down 31.9% to KZT1,965 million (2019: KZT2,887 million).

General and administrative expenses
General and administrative expenses were up 16.8% to KZT10,426 million (2019: KZT8,925 million). The increase was mainly driven by an increase in headcount.

Earnings, financial position and cash flow

EBITDA, excluding non-recurring items, increased by 12.1% to KZT72,147 million (2019: KZT64,364 million). EBITDA margin was 41.3% (2019: 41.1%).

Net finance cost decreased by 9.8% to KZT9,453 million (2019: KZT10,479 million).

Income tax expense amounted to KZT7,044 million compared with KZT2,727 million in 2019. This was due to the recognition of a deferred tax asset on the tax loss carried forward, following the accrual of the fine on the termination of the Network Sharing Agreement with KaR-Tel LLP.

Key financial ratios

	31 December 2020	31 December 2019
Return on equity (%)	21.4	13.5
Return on capital employed (%)	21.8	14.9
Equity/assets ratio (%)	37.9	37.9
Net debt/equity ratio (%)	61.2	71.7
Net debt/EBITDA rate*	0.70	0.83
Owners' equity per share (KZT)	410.4	370.5

*Excluding lease liabilities under IFRS 16.

Net income increased by 75.5% to KZT17,578 million (2019: KZT10,015 million), while earnings per share were KZT87.9 (2019: KZT50.1).

CAPEX increased to KZT26,842 million (2019: KZT20,200 million) and the CAPEX-to-sales ratio was up at 15.4% (2109: 12.9%).

Free cash flow increased by 31.1% to KZT28,708 million (2019: KZT21,900 million).

Promoting a culture of responsibility

As a prominent company in Kazakhstan and in line with its major shareholder Kazakhtelecom, Kcell promotes sustainable practices throughout all its business activities to both strengthen its business and improve the communities in which it operates.

In its bid to become a leader in sustainability, the Company takes a zero-tolerance stance on corruption with anti-bribery measures in place as well as systems to report unethical business practice. Its ethics and compliance framework encapsulates effective implementation and monitoring of these, as well as responsible procurement, human rights, customer privacy, freedom of expression, environmental responsibility, occupational health and safety, employees and social investment.

Our approach

Kcell became a signatory of the United Nations Global Compact more than a decade ago and was the first telecommunications operator in Kazakhstan to do so. Today, we remain committed to following its key principles relating to human rights, labour, environment and anti-corruption – and in accomplishing its mission to create a sustainable and inclusive global economy.

Our approach to sustainability encompasses every aspect of the Company's activities and is at the core of our business model, strategy and philosophy, ensuring accountability for its long-term effect on society and the environment. As one of Kazakhstan's leading companies and with Kazakhtelecom as the majority shareholder, Kcell takes its responsibility as a corporate citizen very seriously. We instil the highest ethical standards throughout the business and i n all our interactions with all our stakeholders, whether: investors, customers, employees, partners, suppliers, other organisations or the general public.

We believe that promoting a culture of responsibility strengthens both our business and our local communities, creating long-term value for our shareholders and society. Our corporate values and commitment to sustainable practices help to mitigate any negative impacts and create a lasting positive effect.

Kcell's sustainability approach is governed by an ethics and compliance framework. This ensures that the Company has systematic procedures in place for implementation, monitoring and compliance in all areas of the business.

Anti-bribery and corruption

The Company has a zero-tolerance approach to corruption and implements effective measures to prevent, monitor and eliminate any form of questionable business practice. Antibribery and corruption (ABC) principles are rooted in all aspects of the Company's activities.

Responsible procurement

Kcell has now brought its Procurement Procedures into line with the Kazakhtelecom centralised procurement system. The Procurement Procedures have been developed in accordance with subparagraph 40) of paragraph 2 of Article 12 of the Procedure for Procurement by the Joint Stock Company "National Welfare Fund" Samruk-Kazyna ". The objectives of the Procedures are: ensuring uniform approaches to the procurement activities of the Companies, creating conditions for the timely and complete satisfaction of the needs of the Companies in goods, works and services with the necessary indicators of price, quality and reliability, efficient use of funds, ensuring transparency of procurement, compliance with the principle of non-disclosure of confidential information. Procurement activities are aimed at the rational use of the Company's funds, increasing the Company's profits, ensuring a constant competitive level of costs, reducing the level of risks for business, and guaranteeing the quality of the Company's purchases.

Human rights

The UN Guiding Principles on Business and Human Rights form the basis of Kcell's own ethical approach to business activities. The results of an independent human rights impact assessment, undertaken in 2016, have since been used to improve the day-to-day measures that it uses in respecting human and labour rights.

Customer privacy

We are committed to respecting and protecting our customers' privacy. The Kcell Privacy Policy sets out the principles and standards by which the Company carries out its safeguarding role, with particular reference to the collection, processing and retention of personal data, transparency, data accuracy, risk assessments, supplier requirements, and technical and organisational measures to protect integrity and confidentiality.

Our belief is that privacy should be integral to all our services, processes, infrastructure and daily activities. We aim to achieve this through the operation of highly secure communication networks and by preventing unauthorised access to customers' personal data.

Environmental responsibility

Kcell has a duty of care in all its regions of operation and a structured approach to managing key environmental impacts through its Environmental Policy. We develop, promote and utilise resource-efficient and environmentally friendly services as a means to reduce our environmental footprint but also to contribute to local and global sustainability. We actively maximise the use of best practice and synergies between our businesses, and working in collaboration with our major shareholder Kazakhtelecom over the last year has presented more opportunities to achieve efficiencies.

SUSTAINABILITY

COVID-19 PREVENTION MEASURES

Kcell responded rapidly and effectively as the COVID-19 pandemic took hold and the government announced a state of emergency in March 2020. Where possible remote working from home was introduced, with employees supplied with all the necessary equipment, VPN access and technical support to facilitate an easy transition to this new mode of working. Where it was necessary for frontline workers, for example, call centre staff, to travel into work, transportation was laid on and full PPE supplied with offices strictly sanitised and regular testing carried out. The Company allocated a short number to enable employees to raise any concerns directly with a qualified doctor. Communication about COVID-19 and the precautionary measures that were being taken was vital and employees were kept well informed and occasional video messages were broadcast to them from the CEO and management.

The Company created a Department of Medical Aid and also opened fully equipped medical offices in Almaty, Nur-Sultan, Shymkent and Atyrau. Material assistance was provided to employees and their families who were victims of the pandemic. Frontline workers were paid a 25% bonus for the sterling efforts. In total, expenses for countering the spread of COVID-19 among employees and their families during 2020 amounted to KZT323 million.

In 2021, remote working will largely continue. In the workplace, the protection of employees remains the utmost priority and all the precautionary measures remain in place: supplied PPE, sanitising, regular testing, social distancing and controlled access. The vaccination programme has begun across the country and we hope to see the positive impact of this during the year. In the meantime, the Company has allocated KZT360 million in its budget to safeguard its employees and it customers against the spread of COVID-19.

Health and safety

The health and safety of Kcell employees are crucial to our business and our primary concern. As the COVID-19 pandemic spread across Kazakhstan during 2020, we were fast to respond and put in place measures to protect our employees – and our customers. You can read more about how we did this in the panel above.

Kcell's Occupational Health and Safety (OHS) Policy sets out the Company's commitment to safeguarding employees in the workplace. This is in accordance with the Labour Code of Kazakhstan and other corresponding regulations. The OHS Policy is based on the international standard OHSAS 18001 and certification is independently audited and confirmed each year by the British Standard Institution. The Company also conducts its own review of OHS risks twice a year, taking corrective action as required.

Our OHS Policy sets out our responsibility to provide safety training and protective clothing and equipment; guarantee optimal labour conditions; standardise sanitary labour conditions; make health care services available; and monitor compliance with occupational safety and health standards. We have also developed and implement specific safety guidelines that cover offices, transport, warehouses and field maintenance.

Employees

Our employees are the lifeblood of our business. As a people-centric organisation, we aim to hire, develop and retain talented people and to be an employer of choice in Kazakhstan. As well as creating a positive and motivating workplace environment, the Company provides a number of benefits over and above those required by Kazakh legislation to help improve the quality of life of both its employees and their families. These include financial for disabled employees, material assistance for employees with disabled children, night transport for Kcell store and call centre workers, paid mobile expenses and a bonus system for sales and services employees.

As of 31 December 2020, Kcell had 2,249 employees (2019: 1,950), up 15.3% year-on-year. We support equality and diversity in the workforce. At the year-end, the Company employed 935 male and 1,314 female staff (2019: 842 male and 1,108 female) representing more than 30 nationalities.

Social

Digital Kazakhstan

Kcell is a major support and active participant in the Digital Kazakhstan programme. One of its aims is to improve access and reduce service costs for both citizens and the government by digitalising government services. During 2020, the Company, along with Kazakhstan's two other mobile operators, signed up to Project 250+ is another Digital Kazakhstan initiative that aims to deliver high-speed internet access to rural communities with populations of 250 or more.

Digital government subscription services

Kcell provides subscription services to the government of Kazakhstan, which previously owned and developed its own services. This is more cost-effective but also allows for a broader scope and better implementation. Two examples of this in working practice are:

– Digital traffic police tablets that help to simplify the process of issuing traffic fines, including accepting payment on the spot using payment cards and improving transparency and accountability.
– Digital ambulance service tablets that help with dispatching, navigation to incident addresses, accessing patient medical information and health records and follow-up patient care checklists ensuring a high standard of service and helping to save lives.

Improved traffic camera efficiency

In another initiative, Kcell is helping to digitalise the process of issuing violations and receiving payment of fines from traffic cameras by matching government vehicle registration databases with its customer information. The Company's solution enables the government to send notifications via SMS messages, instead of mailing notices of fines. Because of the cost-savings made with this solution, the government offers digital payment discounts to reduce the fine.

Mobile government workplace

Kcell is working on a project with National Information Technologies (NIT), the operator of Kazakhstan's e-Government information and communication infrastructure. This will provide government employees with tablets to offer secure connectivity for a mobile workplace.

Big data for tourism

The Company is helping the government use big data to identify tourism patterns. By analysing where tourists come from and which destinations they visit in Kazakhstan, the government will be able to optimise public transport routes, etc.

Promoting a culture of risk awareness at all levels

All organisations face elements of risk when conducting their activities. Kcell has established a robust risk management system to identify and mitigate issues as early as possible, safeguarding its operations and ensuring business continuity, and to reinforcing this through continuous improvement.

Responsibility

Kcell's Board of Directors has overall responsibility for the Company's risk profile, while the Internal Audit Committee is charged with ensuring that appropriate measures are in place. Kcell seeks to promote a culture of risk awareness, management and accountability at all levels within the Company, empowering employees so that risks are more rapidly identified and mitigated.

Risk management is fully integrated into the business planning and control processes, with established procedures, clear lines of reporting and regular reviews. On a day-to-day basis, these are delegated to each business area, departmental heads and dedicated risk co-ordinators with responsibility for:

- Identifying, assessing, managing and mitigating risks
- Making relevant and reasonable efforts to ensure business continuity
- Reporting risks in a timely and clear manner
- Recruiting staff to oversee effective risk evaluation, mitigation and reporting processes
- Maintaining and promoting overall risk awareness
- Ensuring that each department's risk management activities are adequately documented.

Framework

Developed in line with the Committee of Sponsoring Organisations of the Treadway Commission's Enterprise Risk Management guidance, Kcell's risk management framework takes into account the increasing complexity of the evolving business environment and the greater need to identify and evaluate potential threats to ensure continuity. This also takes account of international best practice and recommended governance standards. The Company plans to improve current risk management model in accordance with the recommendations of the majority shareholder of Kazakhtelecom JSC and based on the recommendations of the Committee of Sponsoring Organizations of the Tradeway Commission (COSO) and other best international practices in the field of risk management and internal control.

Process

The main principles of the risk management process are:

- Integrity – considering risk in its entirety
- Openness – making the process easily accessible and understandable
- Structuring – defining a clear structure
- Awareness – promoting objective, accurate and timely information
- Continuity – instigating an ongoing learning process
- Cyclicity – creating a constantly recurring cycle

Principal risks

Using the risk management framework to identify the principal threats to the business, Kcell is able to classify the level of exposure in any given area. This requires drawing on an in-depth knowledge of the Company as well as a thorough understanding of the market and the legal, social, political and cultural environment in which it operates. It also involves simultaneously reviewing Kcell's strategic and operational objectives, including factors critical to its success such as related threats and opportunities.

The Company has identified various principal risks and uncertainties that are key to its day-to-day operations: strategic, operational, financial, legal and natural disaster/catastrophe.

COVID-19 pandemic

During 2020, the state of emergency in Kazakhstan brought restrictions on the movement of the population and the enforced closure of offices and stores over a significant period of time. The potential impacts that this could pose for our strategic and operational objectives have been reviewed in relation to our principal risks and will continue to be addressed for the foreseeable future.

Risks	Mitigation
Strategic risk	Strategic risk is categorised as the potential for losses due to changes or errors in defining and implementing business strategy and development; changes in the political or regional environment; and fluctuations in the market or customer behaviour. This could include increased price competition caused by the activities of other mobile operators or new legislation. Most of these are considered high-risk, requiring the attention of management. Kcell seeks to mitigate these risks by protecting its leadership in 'strong' regions and by offering competitive tariffs and products to increase its market share.
Operational risk	Operational risk is defined as the potential for losses due to defects or errors in internal processes, the supply chain, recruitment, culture and regulations. Most of these have a low risk rating and mitigating actions are already in place as part of the daily risk management procedures. The exceptions to this are information systems and technologies, which Kcell categorises as high risk. Protecting customer privacy and data management are vital parts of the service that the Company offers. Any data breaches could impact on business in both the short and long term. Kcell's networks are supported by the latest information security systems with measures and processes in place to mitigate the threat of cyber-attacks.
Financial risk	The Company can be subject to financial volatility originating from various sources. The risk management framework seeks to minimise potential adverse effects on performance stemming from fluctuations in financial markets as well as other macro and microeconomic factors. Kcell does not use derivative financial instruments to hedge risk exposure. It has detailed policies covering specific areas of financial risk, including credit, foreign exchange and interest rate risk.
Credit risk	The Company's Credit Risk Policy ensures that products and services are sold only to customers and distributors with appropriate credit histories. Where corporate customers have independent credit ratings, these are applied. Otherwise, a risk control assessment is undertaken of a potential customer's credit worthiness based on current financial position, credit history and other factors. Outstanding trade receivables and overdue balances are analysed and followed up by the management, and mobile services are disconnected if customers fail to settle their liabilities. With a highly diversified customer portfolio, which includes a large number of both individuals and companies, Kcell has no significant concentration of credit risk. While income could be affected by economic factors, the management sees no significant risk of loss. Kcell has established relationships with several banks, which are considered to have minimal risk of default. Kazakhstan itself is identified as an emerging market and carries certain inherent risks that apply equally to the banks that hold the Company's cash, cash equivalents and term deposits. The Company has a policy of investing only in financial instruments with high credit ratings, such as US Treasury bills
Foreign exchange risk	The majority of Kcell's purchases of property, plant and equipment and inventories, as well as revenues from certain services like roaming, are denominated in US dollars. As such, most of the Company's foreign exchange risk relates to the movement of the tenge against the US dollar, although profits are less susceptible to this. Given the undeveloped market for financial instruments in Kazakhstan, Kcell does not use derivative financial instruments to hedge its foreign exchange risk. However, the Company has a policy of matching assets and liabilities denominated in foreign currencies where possible and practicable.
Interest rate risk	Overall, Kcell's income and operating cash flow are not dependent upon changes in market interest rates. As of 31 December 2020, the Company had no assets or liabilities with floating interest rates. However, the terms of the existing loan agreements give the banks the right to unilaterally revise interest rates in case of significant market fluctuations.
Legal risk	Legal risk is defined as the potential for uncertainty due to legal action or ambiguity in the application or interpretation of contracts, laws or regulations. Kcell's Legal Department ensures compliance with current legislation, monitors amendments to legislation and participates in relevant draft law debates whenever possible.
Natural disaster/ catastrophe risk	Natural disasters or catastrophes are defined as natural phenomena or processes that provoke catastrophic situations and are characterised by a sudden reduction in the population, the destruction of infrastructure and property and/or death. Kcell has implemented measures aimed at minimising disasters such as fires, accidents and incidents arising from human neglect. These include fire drills, fire alarm systems, regular vehicle servicing, preventive measures against seasonal illnesses, medical insurance, annual medical examinations, diesel generators for use during power failures, deliveries of reserve water supplies to employees and other preventive work.

Risk level

Low | Moderate | Higher

BOARD OF DIRECTORS

Alexey Buyanov
Chairman

Alexey Buyanov has been the Chairman of the Board of Directors and an independent, non-executive director at Kcell since 25 January 2019.

Mr Buyanov is also an Independent Director at Kazakhtelecom and a director at Bengala Investments. From 2002 to 2014, he was Senior Vice President, Chief Financial Officer and member of the Management Board at Sistema Group, an equity fund that is publicly traded on the London Stock Exchange. From 2014 to 2016, he served as Managing Director and Head of the Investment Committee at Redline Capital Management.

Mr Buyanov holds degrees from the Department of Applied Physics and Mathematics at Moscow Institute of Physics and Technology (Russia) and has completed the Oxford Fintech Programme at Said Business School, University of Oxford (UK).

P R S

Jere Calmes
Independent Director

Jere Calmes has been a member of the Board of Directors at Kcell since 15 January 2020.

Jere Calmes has over 20 years' experience of working in the telecommunications, retail and wholesale industry with a strong focus on emerging markets. Between December 2016 and June 2019, he was CEO of METRO Cash and Carry Russia. Prior to that, Mr Calmes worked in various senior managerial positions in the telecommunications industry, including Deputy CEO in Tele 2, CEO at Tele 2 Russia, COO of Wind Telecomunicazioni (Italy), Executive Vice President, General Manager Moscow at VEON and Director Customer Services and Credit Control at Orange Egypt. He also served on the Board of Datagroup JSC (Ukraine) and worked as Managing Director of Fast Lane Ventures and as President and CEO of the Russian pharmacy chain '36.6'. In addition, Mr Calmes was an adviser for Adva Capital.

Mr Calmes holds a BA degree in Political Science and Economics from Bates College, Maine, USA, and he completed the Executive Development Programme at Wharton School of Business.

P A S

Dinara Inkarbekova
Independent Director

Dinara Inkarbekova has been an independent, non-executive director at Kcell since 25 January 2019.

Ms Inkarbekova is also General Manager at Sigma Advisors. From 2010 to 2014, she was General Manager at AKSAI – BMC. In 2015-16, she was a Senior Adviser at Deloitte TCF. In 2016-17, she served as Chief Financial Officer at Estate Management Company.

Ms Inkarbekova holds a bachelor's in Jurisprudence from Turan University (Kazakhstan), a bachelor's in Finance from Narxoz University (Kazakhstan) and an MBA in Economics and Strategic Research from Kazakhstan Institute of Management (Kazakhstan).

A

Key to Committee membership

- ● Committee Chair
- A Internal Audit Committee
- S Sustainability Committee
- R Personnel and Remuneration Committee
- P Strategic Planning Committee

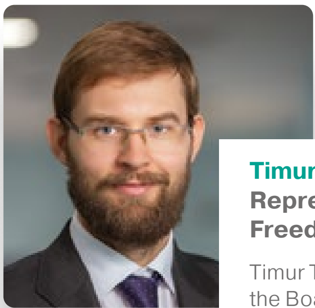
Kuanyshbek Yessekeyev
Representative of shareholder Kazakhtelecom JSC

Kuanyshbek Yessekeyev has been a member of the Board of Directors at Kcell since 25 January 2019.

Since 2010, Mr Yessekeyev has been Chairman of the Management Board and a member of the Board of Directors at Kazakhtelecom.

Mr Yessekeyev holds a degree in Mathematical Science from the Department of Applied Mathematics at Kazakh State University named after Al-Farabi (Kazakhstan), a specialisation in Management from Kazakh State Academy of Management (Kazakhstan), and an executive MBA from Hult International Business School (UK).

P



Timur Turlov
Representative of shareholder Freedom Finance JSC

Timur Turlov has been a member of the Board of Directors at Kcell since 25 January 2019.

Mr Turlov is also General Director at IC Freedom Finance LLC, adviser to the Chairman of the Board at Freedom Finance JSC, Director at FFI Brokerage Service Ltd, Independent Director of the Board of Directors at FFINEU Investments Ltd, Chairman of the Supervisory Board at FFIN Bank LLC, Chairman of the Board of Directors at Freedom Finance JSC, Chairman of the Board of Directors at Freedom Finance Life JSC and Chairman of the Board of Directors at Freedom Finance Insurance JSC.

Mr Turlov graduated from Russian State Technological University (named after Tsiolkovsky) in 2009 with a bachelor's in economics and management.

P R

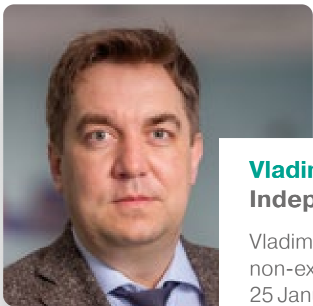
Rashit Makhat
Independent Director

Rashit Makhat has been an independent, non-executive director at Kcell since 25 January 2019.

Mr Makhat is also the owner of PRIMA Investment Company, as well as an Independent Director and member of the Board of Directors at the Kazakhaltyn metals and mining company. From 2013 to 2016, he was a member of the Board of Directors and Independent Director at Tartyp JSC. In 2014-15, he served as a member of theBoard of Directors and Independent Director at Kazakhstan Engineering. In 2016-17, he was a member of the Board of Directors and Independent Director at Kazkommertsbank JSC.

Mr Makhat holds a degree in Economics from Kokshetau State University (Kazakhstan) and is a graduate of the Department of International Economic Relations at Moscow State University of International Relations (Russia).

P R



Vladimir Popov
Independent Director

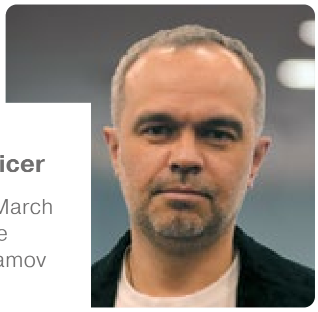
Vladimir Popov has been an independent, non-executive director at Kcell since 25 January 2019.

Mr Popov is also a Managing Partner at PRO VIDENS. In addition, he has a service contract as an Independent Legal Adviser on privatisation and M&A projects. From 2010 to 2016, he was Chief Legal Officer at international private investment fund AMUN Capital Advisors KZ.

Mr Popov holds a degree in Jurisprudence from Kazakh State Law University (Kazakhstan).

S A

MANAGEMENT BOARD

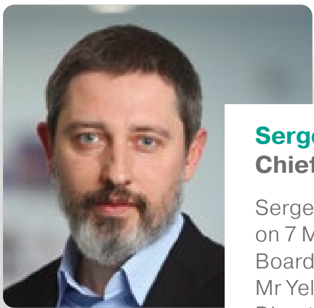


Yuri Kharlamov
Chairman of the Management Board, Chief Executive Officer

Yuri Kharlamov was appointed as Chief Financial Officer at Kcell on 7 March 2019 and has been a Member of the Management Board since 19 June 2020. On 6 February 2021, the Board of Directors appointed Mr Kharlamov as Chairman of the Management Board, Chief Executive Officer.

Before joining the Company, Mr Kharlamov had more than 20 years' experience in the telecommunications industry, having held a number of senior-level management positions including positions of CEO and CFO in Golden Telecom, Corbina Telecom, VympelCom and Svyaznoy. From 2010 to 2019, Mr Kharlamov was a Partner at Constanta, where he managed over 100 management consulting projects for the largest players in the technology, media and telecommunications sector in Russia and the CIS. Just before joining Kcell, Mr Kharlamov held the position of General Director of Risk Service and was a co-founder and CEO of Big Data analytics project at Predictive Technologies.

Mr Kharlamov graduated from the Moscow Institute of Electronic Technology with a degree in Management and the University of Birmingham with a degree in Finance, and has an MBA degree from London Business School.



Sergey Yeltsov
Chief Legal Officer

Sergey Yeltsov was appointed as Chief Legal Officer at Kcell on 7 March 2019 and has been a Member of the Management Board since 19 June 2019.Before joining the Company, Mr Yeltsov was a non-executive member of the Board of Directors at Kazakhaltyn JSC from 2017 to 2019, and a Managing Director and member of the Management Board at Kazkommertsbank JSC from May 2016 to June 2017. He also worked at Kemont JSC, as Corporate Development Director and Administrative Director, from January 2015 to May 2016, and as Managing Director at Green Apple LLP from September 2013 to January 2015. Prior to that, he held numerous executive and advisory positions in the banking, metals and mining and telecommunications sectors.

Mr Yeltsov obtained a Bachelor's in International Law from Kazakh Institute of Law and International Relations (Kazakhstan) in 1997, and a Master's in Banking and Finance from Almaty Academy of Economics and Statistics (Kazakhstan) in 2005. He also completed an executive education programme in 2007.

Askar Yesserkegenov
Chief Technical Officer

Askar Yesserkegenov was appointed as Chief Technical Officer at Kcell on 7 March 2019 and has been a Member of the Management Board since 19 June 2019.

Before joining the Company, Mr Yesserkegenov worked for 16 years at Kazakhtelecom JSC in numerous roles, including Managing Director from September 2013 and Chief Commercial Officer from September 2007. Prior to that, he spent two years at other telecommunications companies in Kazakhstan, as well as over five years at Kazakhtelecom JSC, which he first joined in 1996.

Mr Yesserkegenov graduated with a Bachelor's degree in Radio Engineering from Moscow Electrotechnical University of Communications (Russia) in 1988 and with an MBA from the International Business Academy (Russia) in 2005.

Changes to the Management Board

On 12 April 2021, The Board of Directors announced the following changes to the Management Board:

– The resignation of Sergey Yeltsov, member of the Management Board and Chief Legal Officer from 16 April 2021 at his own instigation.

– The appointment of the following members of the Management Board from 19 April 2021 to 1 July 2022 of Sevil Gassanova (Chief Legal Officer), from 9 April 2020 to 1 July 2022 of Maria Averchenko (Chief Commercial Officer), and from 9 April to 1 July 2022 of Alexey Bobrov (Chief Financial Officer).

Strengthening our governance framework

The COVID-19 pandemic gave us all pause for thought and prompted initiatives to strengthen and add to our existing corporate governance framework.

In addition to adhering to international best practice, Kcell's corporate governance standards conform to that of its major shareholder Kazakhtelecom JSC and the enhanced standards of National Welfare Fund Samruk-Kazyna. Kcell's Corporate Governance Code was updated in 2019 in order to align with the National Welfare Fund Samruk-Kazyna's Corporate Governance Code and the UK Corporate Governance Code. It also complies with the regulations of the Kazakhstan Stock Exchange in relation to joint stock companies and securities.

The principles of fairness, honesty, responsibility, transparency, professionalism and expertise form the core of the Company's approach to corporate governance. These in turn ensure the respect and protection for the rights and interests of all stakeholders; increase Kcell's efficiency and market value; and promote financial stability and profitability.

National Welfare Fund Samruk-Kazyna's Corporate Governance Code

The corporate governance guidelines for National Welfare Fund Samruk-Kazyna companies are established by Kazakhstan's Model Code and based on international best practice. All National Welfare Fund Samruk-Kazyna companies apply these general rules and recommendations about corporate governance.

Corporate governance principles

Protecting the rights and interests of shareholders	Kcell's corporate governance practices protect and respect shareholders' rights and legitimate interests, and contribute to efficient operations, seeking to grow assets and maintain financial stability and profitability.
Effective management by the Board of Directors and Management Board	The Board of Directors aim to increase the Company's market value while following the principles of utmost respect and realisation of shareholders' interests. Kcell understands the need for a leader in the person of the Chairman of the Management Board to manage day-to-day operations, supported by a collective body to resolve issues that arise during the management process.
Transparency and objectivity in disclosure of information about operations	The Company aims to ensure maximum transparency through the timely and accurate disclosure of reliable information to shareholders and stakeholders, including its financial position, economic indicators, performance, ownership and management structure.
Ethics and compliance	Kcell operates in strict accordance with the law and generally accepted standards of business ethics, as well as its Charter, Corporate Governance Code, Regulation on the Board of Directors, listing rules and contractual obligations.
Effective dividend policies	The Company pays dividends in accordance with the Dividend Policy, the law, the Charter and the relevant resolutions of the General Meeting of Shareholders. When payment of dividends is declared, such dividends shall be paid in the manner set forth by the law.
Effective HR policies	The Company guarantees its employees' rights under the law and its Code of Ethics and Conduct. Kcell aims to develop partnership relations with staff to address social issues and regulate working conditions.
Sustainability	The Company recognises the importance of its influence on the economy, environment and society. As such, it is committed to ensure its sustainable development in the long term, while striving to balance the interests of stakeholders and increase its long-term value.
Management of corporate conflicts and conflict of interest	Members of the Board of Directors and the Management Board, as well as employees, perform their professional duties in good faith and on reasonable grounds, with due care and diligence, in the interests of Kcell and its shareholders, while avoiding conflicts of interest. Should a conflict occur, Company officials declare their interest to the Corporate Secretary.

CORPORATE GOVERNANCE

Corporate governance policies

In 2020, further efforts were made to strengthen Kell's corporate governance framework by updating the Company's governance policies, consistent with the requirements of Kazakhtelecom JSC, National Welfare Fund Samruk-Kazyna, local laws and best international practice. Kcell updated its Accounting Policy and adopted a new key Investment Policy.

Kcell also has the following existing corporate policies in place:

– Financial Management Policy (second version)
– Insurance Policy
– Risk Management Policy
– Communication Policy
– Recruitment Policy
– Insider Information Policy
– Insider Trading Policy
– Security Policy (second version)
– Privacy Policy
– Freedom of Expression in Telecommunications Policy
– Occupational Health and Safety Policy
– Supplier Code of Conduct
– People Policy
– Environmental Policy
– Competition Policy
– Policy on Enterprise Risk Management
– Policy on Electromagnetic Fields
– Code of Ethics and Conduct
– Anti-Corruption Policy
– Regulations of the Board of Directors of Kcell JSC
– Dividend Policy

Futureproofing the Kcell business

While we feel that the Company handled the COVID-19 situation in an exemplary manner, there can be no doubt that Kcell would benefit from having protocols in place to mitigate against future crises. With that in mind, we have instigated a dual approach: setting up a Crisis Management Team (CMT) and plans; formalising a Business Continuity Management (BCM) process.

The Kcell CMT is under the chairmanship of the Chairman of the Management Board and is drawn from human resources, communications, legal affairs, technology and business functions. The role of the CMT is to ensure that Kcell has emergency incidents and crisis management plans and procedures in place to protect human life, ensure business continuity and minimise economic losses. A detailed Crisis Management Plan is now in place that details key personnel and resources as well as contingencies for certain scenarios and defined lines of responsibility. All CMT members will receive regular training and the plan will be reviewed annually to affirm its effectiveness.

The BCM process is based on Kcell's Risk Management Policy and Security Policy. Its purpose is to identify and implement measures aimed at ensuring the resilience of critical processes, functions, services and products, whose failure would have a significant impact on Kcell's ability to provide its core services and products.

The BCM process consists of business impact analysis, risk assessment business continuity strategy, business continuity solutions and business continuity plans. It will allow the Company to identify any potential risks and threats to the business and assess the extent of their impact on activities. Training and education will be provided for directors, section/unit heads, owners of services/products critical for the Company, branch managers, and also employees with assigned functions and responsibilities that fall within the BCM scope.

BCM will enable Kcell to respond effectively to significant business interruptions and enhance the Company's sustainability. This will, in turn, protect the interests of Kcell customers and shareholders.

Board of Directors

Kcell's Charter sets out the duties of the Board of Directors and Management Board, the latter of which is chaired by the CEO. Under the Charter, the Board is responsible for the general management of Kcell's activities. Besides formulating strategies and approving plans for the Company's development, the Board is responsible for taking decisions on establishing Kcell branches and representative offices; on the Company acquiring or disposing of 10% or more of third-party shares; on concluding major transactions and transactions with related parties; on approving annual budgets; and on deciding other issues that belong to the exclusive competence of the Board of Directors according to the Company's Charter and the Joint-Stock Company Law of Kazakhstan.

The status of Kcell's Board of Directors, working arrangements, procedures for convening and holding meetings, formalising decisions and the responsibilities of members of the Board of Directors are set out in the Regulations of the Board of Directors.

Kcell's CEO and Management Board are a highly professional team with expertise and experience in telecommunications, finance, marketing and information technology. The CEO's responsibilities in managing daily operations, with the support of the Management Board, are set out in the Company's Charter. These include all matters that fall outside the exclusive jurisdiction of the Board of Directors or the General Meeting (GM) of Shareholders. In addition, the Management Board is responsible for undertaking decisions taken by a GM and the Board of Directors.

Membership of the Board of Directors

Members of the Board of Directors are elected at the GM, where their terms of office are also decided. At the time of writing, all but one of the current directors were elected at an Extraordinary General Meeting (EGM) of Shareholders before the reporting period, on 25 January 2019. At an EGM held on 15 January 2020, Jere Calmes was elected as an independent, non-executive director at Kcell. Five of the seven members of the Board were independent directors[1], including the Chairman. Of the remaining two directors, one was representative of the controlling shareholder, Kazakhtelecom JSC, and one was a representative of another shareholder, Freedom Finance JSC. The composition of the Board of Directors during the reporting period is presented below:

- Alexey Buyanov (independent director)
- Rashit Makhat (independent director)
- Dinara Inkarbekova (independent director)
- Vladimir Popov (independent director)
- Jere Calmes (independent director)
- Kuanyshbek Yessekeyev (representative of shareholder Kazakhtelecom JSC)
- Timur Turlov (representative of shareholder Freedom Finance JSC)

The biographies of the Board of Directors can be found on pages 38-39.

At an EGM held after the reporting period, on 26 February 2021, Timur Khudaiberdiyev and Serik Saudabayev were elected to the Board of Directors as representatives of Kazakhtelecom JSC. As such, the Board of Directors currently has five independent directors, including the Chairman, as well as three representatives of Kazakhtelecom JSC and one representative of Freedom Finance JSC.

As of 31 December2020, Timur Turlov held 398,576 shares in Kcell.

1 The Company Charter and the law require that at least 30% of the members of the Board be independent Directors. Mr Buyanov, Mr Makhat, Ms Inkarbekova, Mr Popov and Mr Calmes, are independent in accordance with the requirements of Kazakh law on joint-stock companies.

Corporate Governance framework

Strategic report
Governance
Financial statements

CORPORATE GOVERNANCE

Committees of the Board of Directors

Kcell has established the following committees to consider important issues and prepare recommendations for the Board of Directors: Strategic Planning Committee, Personnel and Remuneration Committee, Internal Audit Committee and Sustainability Committee. This is in line with the legal requirements for joint-stock companies in Kazakhstan.

Additional committees may be created at the discretion of the Board. The Chairperson of each committee is an independent director. By law, committees must be drawn from members of the Board of Directors with the relevant expertise to serve on the given committee. All committees are advisory bodies of the Board of Directors.

Committee name	Role	Committee chair and members
Strategic Planning Committee	Makes recommendations to the Board of Directors on strategic development. Five meetings were held in 2020.	Rashit Makhat (Chairman) Alexey Buyanov Kuanyshbek Yessekeyev Timur Turlov Jere Calmes
Personnel and Remuneration Committee	Makes recommendations to the Board of Directors on qualification requirements for employees, appointment and dismissal of certain employees, bonuses and salary for management bodies, and internal documents evaluating staff fitness, training and motivation of employees. Three meetings were held in 2020.	Rashit Makhat (Chairman) Alexey Buyanov Timur Turlov
Internal Audit Committee	Makes recommendations to the Board of Directors on financial statements, internal controls and risk management, and internal and external audits. Six meetings were held in 2020.	Dinara Inkarbekova (Chairperson) Jere Calmes Vladimir Popov
Sustainability Committee	Makes recommendations to the Board of Directors on internal documents related to social accountability and sustainable development; improvement of the sustainability strategy; development and implementation of policies and procedures relating to environmental and social sustainability, including but not limited to, respecting human rights, environmental safety, social responsibility, and compliance with business ethics requirements in accordance with internal documents and applicable legislation. Two meetings were held in 2020.	Vladimir Popov (Chairman) Alexey Buyanov Jere Calmes

Board activities

Kcell uses specialist software, which provides end-to-end security for its governance and workflow management as well as helping to improve Board communications and effectiveness. The Board of Directors held 12 meetings in total during 2020: two were conducted in person, eight via conference calls and two meetings by voting in absentia.

The Board's activities during 2020 included:

- updates on business, commercial, operational and legal matters, and approvals arising from these;
- approval of major transactions;
- approval of the appointment and terms of employment of members of the Management Board and executive bodies of Kcell subsidiaries;
- preliminary approval of the 2019 annual financial report and approval of quarterly financial reports;
- convocation of the 2020 AGM, including dividend proposals;
- approval of interested-party transactions;
- approval of the auditor's fee for 2020 audit services;
- approval of revisions to policies, including the updated Code of Ethics and Conduct and Accounting Policy as well as approval of new Investment Policy;
- approval of changes to the terms and conditions of loan agreements.

The Board's agenda for 2021 is as follows:

- updates on business, commercial, operational and legal matters, and approvals arising from these;
- approval of major transactions;
- approval of the appointment and terms of employment of members of the Management Board;
- preliminary approval of the 2020 annual financial report and approval of quarterly financial reports;
- convocation of the 2021 AGM, including dividend proposals;
- other issues within the Board's remit.

There are eight Board meetings scheduled for 2021, which will cover regular items such as financial results, risks reviews and reports from the Management Board and Board committees. In addition, ad hoc meetings or conference calls will be held as and when required for approvals when there is no scheduled meeting planned.

Accountability and viability

The Board of Directors is responsible for preparing the Annual Report and Accounts. They consider that the 2020 Annual Report and Accounts, taken as a whole, are fair, balanced and understandable, and provide the information necessary for shareholders to assess the Company's position and performance, business model and strategy. A description of the basis on which Kcell JSC generates value over the longer term, its business model, and the strategy for delivering its objectives are explained in the Strategic Report on pages 18-23.

The Board has assessed Kcell's prospects over the next year, being the period over which the key risks facing the Company can be accurately evaluated and mitigated. Based on this, the Board has a reasonable expectation that Kcell will be able to continue to operate and meet its liabilities as they fall due over that period.

The Board has carried out a robust assessment of the principal risks facing the Company, including those that would threaten its business model, future performance, solvency or liquidity. These risks and an explanation of how they are being managed or mitigated are described in the Risk Management section on pages 36-37. The Board monitors Kcell's

risk management and internal control systems, and has reviewed their effectiveness during the year. This review has covered all material controls, including financial, operational and compliance controls.

Internal Audit Committee

The Internal Audit Committee met six times during 2020. It considered significant issues in relation to financial statements and the findings of an internal audit.

An Internal Audit department was established in Kcell JSC in 2013, and the Committee monitors and reviews the effectiveness of its activities.

The Committee also has p
rimary responsibility for making recommendations to the General Meeting of Shareholders on the appointment, re-appointment and removal of the external auditor. At the AGM on 29 May 2019, Ernst & Young LLP was approved as Kcell's new external auditor for 2019-21 to replace Deloitte, the Company's auditor since 2014. To protect its independence, Kcell does not engage Ernst & Young LLP for any non-audit services for the Company; a similar practice was previously in place with Deloitte.

CORPORATE GOVERNANCE

Remuneration of the Board of Directors

In line with the current Remuneration Policy, the Company remunerates independent directors in two parts: fixed annual remuneration and additional annual remuneration for chairing the Board or one of its committees. The policy also provides for the reimbursement of expenses that Board members incur when performing their duties.

The GM held in 2019 established the following gross annual remuneration for independent directors: fixed annual remuneration of US$75,000; annual additional remuneration for chairing the Board of Directors of US$25,000; and annual additional remuneration for chairing a committee of the Board of Directors of US$15,000.

According to the payment terms, 50% of the fixed annual remuneration fee and additional annual remuneration for chairing the Board or one of its committees is paid six months after an independent director takes office; and the remaining 50% is paid one year later.

In 2020, the total remuneration paid to the Board of Directors was US$422,600 (gross).

Relations with shareholders

The Board of Directors is in regular dialogue with Kcell's shareholders through representatives from Kazakhtelecom JSC and Freedom Finance JSC.

Management Board

Kcell's Management Board is collectively tasked with managing day-to-day operations. The Company, however, understands the need for a leadership role, one that is undertaken by the CEO as the chairman of the Management Board.

The Management Board follows the principles of legality, honesty, good faith, reasonableness, regularity, professionalism and objectivity. It acts with the utmost respect for shareholders' interests and is fully accountable to the GM and Board of Directors.

During the reported period Kcell's Management Board consisted of the following members:

- Kaspars Kukelis – Chairman of the Management Board, Chief Executive Officer
- Askar Yesserkegenov – member of the Management Board, Chief Technical Officer
- Sergey Yeltsov – member of the Management Board, Chief Legal Officer
- Hikmatulla Nasritdinhodjaev – member of the Management Board, Chief Commercial Officer

Yuri Kharlamov was appointed to the Board as a Chief Financial Officer on 19 June 2020. Subsequently, on 4 July 2020, Board accepted resignation of Hikmtulla Nasritdinhodjaev, Chief Commercial Officer; Chief Executive Officer, Kaspars Kukelis resigned on 3 January 2021and transferred to a new position within Kazakhtelecom Group. On 6 February 2021, the Board appointed Yuri Kharlamov as Chairman of the Management Board, Chief Executive Officer.

Given the above changes Kcell's Management Board currently comprises three members:

- Yuri Kharlamov – Chairman of the Management Board, Chief Executive Officer
- Askar Yesserkegenov – member of the Management Board, Chief Technical Officer
- Sergey Yeltsov – member of the Management Board, Chief Legal Officer

The biographies of the Management Board can be found on page 40.

INDEPENDENT AUDITOR'S REPORT

To the Shareholders and the Audit committee of the Board of directors of Kcell JSC

Opinion

We have audited the consolidated financial statements of Kcell JSC and its subsidiaries (hereinafter, the Group), which comprise the consolidated statement of financial position as at 31 December 2020, 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 a summary of significant accounting policies.

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 2020 and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs).

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' (IESBA) International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), and we have fulfilled our other ethical responsibilities in accordance with 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.

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 our audit addressed the key audit matter
Revenue recognition	
There is a significant risk of misstatement relating to the recognition and measurement of revenue from telecommunication services as the billing systems employed by the Group are complex. In addition, effect of accounting treatment of changing tariff structures and multi-element arrangements on revenue could be significant. The selection and application of revenue recognition policies, including the application of IFRS 15, involve a number of key judgements and estimates, and therefore revenue could be subject to misstatement, whether due to fraud or error, including untimely recognition. The Group's disclosure of information in respect of the accounting policies on revenue recognition is included in Note 3 to the consolidated financial statements, and detailed revenue disclosures are included in Note 24 to the consolidated financial statements.	We have considered the relevant IT systems and the design of controls, and tested the operating effectiveness of controls over capture and recording of revenue transactions; authorisation of changes and accounting treatment of tariff rates input to the billing systems; and calculation of amounts billed to the customers. We performed substantive analytical procedures, including monthly fluctuations analysis and analysis of changes in key drivers of revenue, and compared financial and non-financial data. We also analysed the timeliness of revenue recognition. We analysed the key judgements and estimates, and the accounting policy for compliance with IFRS 15. We considered revenue disclosures in light of the requirements of IFRS 15.

INDEPENDENT AUDITOR'S REPORT (continued)

Key audit matter	How our audit addressed the key audit matter
Accounting for leases in accordance with of IFRS 16 Leases	
The Group has significant balances of right-of-use assets in the amount of 21 billion tenge and lease liabilities in the amount of 24 billion tenge. The accounting for right-of-use assets and lease liabilities in accordance with IFRS 16 is significant to our audit, as the balances recorded are material. In addition, the procedures of identification and processing all relevant data associated with the leases are complex and the measurement of the right-of-use assets and lease liabilities is based on assumptions such as discount rates and the lease terms, including termination and renewal options. Moreover, in 2020 the Group adopted IFRIC agenda decision on the determination of the lease term for cancellable or renewable leases and retrospectively re-assessed its accounting for the lease contracts of technical sites with the governmental entities. The Group's disclosure in respect of the accounting policies on lease recognition and measurement in accordance with IFRS 16 Lease is included in Note 3 to the consolidated financial statements, the effect of the IFRIC agenda decision on the Group accounting policy is disclosed in Note 4 to the consolidated financial statements and detailed lease disclosures are included in Note 18 to the consolidated financial statements.	We performed testing of the completeness of the identified lease contracts on a sample basis and testing of the accuracy of the input in the lease calculation. We challenged management assumptions, specifically the assumptions used to determine the discount rates and lease terms, including termination and renewal options. We recalculated the right-of-use assets and lease liabilities by type of lease contracts. We analyzed the updated accounting policy on the lease contracts of technical sites with the governmental entities in light of adoption of IFRIC agenda decision on the determination of the lease term for cancellable or renewable leases. We considered the appropriateness of the related disclosures provided in the Group's consolidated financial statements.
Costs capitalization	
The Group capitalises significant internal labour costs and external costs in respect of major capital projects, including mobile network upgrades. There is risk in respect of valuation and allocation of assets, that costs which do not meet the criteria for capitalisation in accordance with IAS 16 and IAS 38 are capitalised or that assets continue to be recognized as non-current assets despite no longer meeting the relevant capitalisation criteria. Due to the relative size of the Group's mobile network related property and equipment and intangible assets in the consolidated statement of financial position and the area of judgment around the application of capitalization criteria, we considered this as one of the key audit matters. The Group's policy on the capitalisation of assets is included in Note 3 to the consolidated financial statements, and detailed property and equipment and intangible assets disclosures are included in Note 8 and Note 9, respectively, to the consolidated financial statements.	We obtained an understanding of the process around the property and equipment cycle and intangible assets cycle. We have considered the design and tested the operating effectiveness of related controls. We analysed the appropriateness of costs capitalization policies of the Group. We have carried out substantive testing in relation to each element of capitalised costs including inspecting supporting evidence for a sample of the capitalised costs and understanding the nature of the costs capitalised. We assessed the timeliness of the transfer of assets from the constructions-in-progress to the property and equipment and intangibles assets. In addition, we analysed assets recognized as non-current assets for compliance with capitalisation criteria. We considered the appropriateness of the related disclosures provided in the Group consolidated financial statements.

Other information included in the Group's 2020 Annual report

Other information consists of the information included in the Group's 2020 Annual report, other than the consolidated financial statements and our auditor's report thereon. Management is responsible for the other information. The Group's 2020 Annual report 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.

Responsibilities of management and the Audit committee of the Board of directors for the consolidated financial statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with IFRSs, and for such internal control as management determines is necessary to enable the preparation of the 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 of the Board of directors 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 skepticism 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.
- 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.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

We communicate with the Audit committee of the Board of directors 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 of the Board of directors 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 of the Board of directors, 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.

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

Ernst & Young LLP

Paul Cohn
Audit Partner

Rustamzhan Sattarov
Auditor / General Director
Ernst & Young LLP

Auditor qualification certificate No. МФ – 0000060 dated 6 January 2012

050060, Republic of Kazakhstan, Almaty, Al-Farabi ave., 77/7, Esentai Tower

29 January 2021

State audit license for audit activities on the territory of the Republic of Kazakhstan: series МФЮ–2, No. 0000003 issued by the Ministry of finance of the Republic of Kazakhstan dated 15 July 2005

CONSOLIDATED STATEMENT OF FINANCIAL POSITION

As at 31 December 2020

In millions of tenge	Notes	31 December 2020	31 December 2019 (restated)*	1 January 2019 (restated)*
Assets				
Non-current assets				
Property and equipment	8	**78,109**	82,283	88,437
Intangible assets	9	**39,730**	38,820	40,115
Advances paid for non-current assets		**293**	233	729
Right-of-use assets	18	**20,804**	24,976	27,816
Long-term trade receivables	10	**2,421**	1,118	3,010
Cost to obtain contracts		**185**	240	389
Other non-current assets		**–**	3	37
Deferred tax assets	30	**1,937**	1,378	–
Total non-current assets		**143,479**	149,051	160,533
Current assets				
Inventories	11	**9,362**	6,636	4,728
Trade receivables	10	**17,823**	15,647	13,787
Other current non-financial assets	12	**3,063**	6,704	5,276
Other current financial assets	13	**245**	1,371	1,011
Prepaid income tax		**813**	2,222	933
Financial assets at fair value through other comprehensive income	14	**–**	4,965	–
Financial assets at amortized cost	15	**18,923**	–	–
Cash and cash equivalents	16	**23,023**	8,825	6,029
Total current assets		**73,252**	46,370	31,764
Total assets		**216,731**	195,421	192,297
Equity and liabilities				
Share capital	7	**33,800**	33,800	33,800
Retained earnings		**48,283**	40,297	36,254
Total equity		**82,083**	74,097	70,054
Non-current liabilities				
Borrowings: non-current portion	17	**49,933**	55,548	14,936
Long-term lease liabilities	18	**19,447**	23,447	25,184
Asset retirement obligation	22	**4,007**	1,970	1,285
Financial guarantee obligation	20	**563**	–	–
Other non-current liabilities		**–**	–	77
Deferred tax liabilities	30	**–**	1,183	1,302
Total non-current liabilities		**73,950**	82,148	42,784
Current liabilities				
Borrowings: current portion	17	**23,354**	6,384	51,783
Trade payables	19	**22,353**	21,175	14,048
Contracts liabilities	21	**1,978**	4,149	3,772
Provisions	23	**4,502**	188	2,911
Due to employees		**3,691**	3,172	1,717
Short-term lease liabilities	18	**4,219**	3,606	3,642
Property tax payable		**601**	502	1,586
Total current liabilities		**60,698**	39,176	79,459
Total liabilities		**134,648**	121,324	122,243
Total equity and liabilities		**216,731**	195,421	192,297

* Certain amounts shown here do not correspond to the consolidated financial statements for the year ended 31 December 2019, as they reflect the adjustments made, as detailed in Note 4.

Yuri Kharlamov
Acting Chairman of the Management Board & Chief Financial Officer

The accounting policies and notes on pages 54 to 100 are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME

For the year ended 31 December 2020

In millions of tenge	Notes	2020	2019 (restated)*
Revenue from contracts with customers	24	**174,684**	156,657
Cost of sales	25	**(119,133)**	(108,928)
Gross profit		**55,551**	47,729
Penalty expenses	26	**–**	(14,552)
Provisions for legal claims	23	**(4,386)**	–
General and administrative expenses	27	**(10,426)**	(8,925)
Impairment of financial assets	10	**(1,547)**	(2,256)
Impairment of property and equipment and intangible assets	8, 9	**(5,227)**	(1,844)
Selling expenses	28	**(1,965)**	(2,887)
Reversal of tax and related fines and penalties provision	33	**684**	5,816
Other operating income		**550**	–
Other operating expenses		**(408)**	–
Operating profit		**32,826**	23,081
Finance costs	29	**(11,753)**	(11,895)
Finance income	29	**2,300**	1,415
Net foreign exchange gain/(loss)		**987**	(91)
Other non-operating income		**262**	317
Other non-operating expenses		**–**	(85)
Profit before tax		**24,622**	12,742
Income tax expenses	30	**(7,044)**	(2,727)
Profit for the year		**17,578**	10,015
Other comprehensive income		**–**	–
Total comprehensive income for the year, net of tax		**17,578**	10,015
Earnings per share			
Basic and diluted, tenge	7	**87.89**	50.08

* Certain amounts shown here do not correspond to the consolidated financial statements for the year ended 31 December 2019, as they reflect the adjustments made, as detailed in Note 4.

Yuri Kharlamov
Acting Chairman of the Management Board & Chief Financial Officer

The accounting policies and notes on pages 54 to 100 are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY

For the year ended 31 December 2020

In millions of tenge	Share capital	Retained earnings	Total equity
At 1 January 2019 (as previously reported)	33,800	33,626	67,426
Change in accounting policy and correction of errors (Note 4)	–	2,628	2,628
At 1 January 2019 (restated)*	33,800	36,254	70,054
Net profit for the year	–	10,015	10,015
Other comprehensive income	–	–	–
Total comprehensive income	–	10,015	10,015
Dividends declared (Note 7)	–	(5,972)	(5,972)
At 31 December 2019 (restated)*	33,800	40,297	74,097
Net profit for the year	**–**	**17,578**	**17,578**
Other comprehensive income	**–**	**–**	**–**
Total comprehensive income	**–**	**17,578**	**17,578**
Financial guarantee (Note 20)	**–**	**(592)**	**(592)**
Dividends declared (Note 7)	**–**	**(9,000)**	**(9,000)**
At 31 December 2020	**33,800**	**48,283**	**82,083**

* Certain amounts shown here do not correspond to the consolidated financial statements for the year ended 31 December 2019, as they reflect the adjustments made, as detailed in Note 4.

Yuri Kharlamov
Acting Chairman of the Management Board & Chief Financial Officer

The accounting policies and notes on pages 54 to 100 are an integral part of these consolidated financial statements.

CONSOLIDATED STATEMENT OF CASH FLOWS

For the year ended 31 December 2020

In millions of tenge	Notes	2020	2019 (restated)*
Cash flows from operating activities			
Profit before tax		**24,622**	12,742
Adjustments for:			
Impairment of financial assets	10	**1,547**	2,256
Impairment of property and equipment and intangible assets	8, 9	**5,227**	1,844
Finance costs	29	**11,753**	11,895
Depreciation of property and equipment and right of use assets	8, 18	**19,792**	21,122
Amortization of intangible assets	9	**11,010**	9,390
Income from accounts payable write-off		**(189)**	–
Write-off of inventory to net realizable value	11	**654**	–
Loss on disposal of property and equipment		**273**	–
Finance income	29	**(2,300)**	(1,415)
Legal disputes expenses	23	**4,386**	–
Reversal of tax and related fines and penalties provision	33	**(684)**	(5,816)
Gain on cancellation of lease agreements		**(21)**	(10)
Net foreign exchange (gain)/loss		**(987)**	91
Operating cash flows before changes in operating assets and liabilities		**75,083**	52,099
Change in inventories		**(3,272)**	(1,908)
Change in trade receivables		**(4,762)**	(2,197)
Change in other current non-financial assets		**4,254**	(953)
Change in other current financial assets		**1,129**	(326)
Change in cost to obtain contracts		**54**	149
Change in trade payables		**(1,708)**	2,017
Change in other current non-financial liabilities			117
Change in other current financial liabilities		**114**	(70)
Change in contract liabilities		**(2,171)**	377
Change in taxes payable other than income tax		**100**	(1,115)
Cash flows generated from operations		**68,821**	48,190
Income tax paid		**(7,378)**	(3,313)
Interest received		**1,719**	404
Interest paid	32	**(10,903)**	(10,220)
Net cash flows from operating activities		**52,259**	35,061
Cash flows from investing activities			
Purchase of property and equipment		**(12,142)**	(8,832)
Purchase of intangible assets		**(11,413)**	(4,329)
Proceeds from disposal of property and equipment		**161**	–
Proceeds from redemption of financial assets at amortized cost	15	**18,139**	–
Proceeds from redemption of financial assets at fair value through other comprehensive income	14	**5,385**	–
Purchase of financial assets at amortised cost	15	**(36,751)**	–
Purchase of financial assets at fair value through other comprehensive income	14	**–**	(5,021)
Net cash flows used in investing activities		**(36,621)**	(18,182)
Cash flows from financing activities			
Proceeds from loans	32	**27,000**	20,000
Proceeds from bonds issued		**–**	17,025
Repayment of loans	32	**(16,130)**	(42,000)
Repayment of principal portion of lease liabilities	4, 32	**(3,758)**	(3,085)
Dividends paid	7	**(9,000)**	(5,972)
Net cash flows used in financing activities		**(1,888)**	(14,032)
Net increase in cash and cash equivalents		**13,750**	2,847
Effect of exchange rate changes on cash and cash equivalents held in foreign currency		**448**	(51)
Cash and cash equivalents at the beginning of the year		**8,825**	6,029
Cash and cash equivalents at the end of the year	16	**23,023**	8,825

** Certain amounts shown here do not correspond to the consolidated financial statements for the year ended 31 December 2019, as they reflect the adjustments made, as detailed in Note 4.

Yuri Kharlamov
Acting Chairman of the Management Board & Chief Financial Officer

The accounting policies and notes on pages 54 to 100 are an integral part of these consolidated financial statements.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS

For the year ended 31 December 2020

1. General information

Kcell JSC (the "Company") was established as a limited liability partnership (GSM Kazakhstan OAO Kazakhtelecom LLP) on 1 June 1998 to design, construct and operate a cellular telecommunications network in the Republic of Kazakhstan, using the GSM (Global System for Mobile Communications) standard.

The Company's registered address is Samal-2, 100, Almaty, the Republic of Kazakhstan.

On 27 August 2012, the Ministry of Justice registered the Company as a Joint Stock Company. Under Kazakhstani law, upon the conversion, retained earnings as of the date of the conversion became share capital of the Company and ceased to be available for distribution to shareholders.

On 13 December 2012, the Company successfully completed its offering of Global Depositary Receipts at the London Stock Exchange and common shares at the Kazakhstan Stock Exchange.

In 2016 the Group paid 26,000 million tenge for LTE radio frequencies. On 1 March 2016, the Group launched LTE in its network on the previously granted frequencies.

As at 31 December 2020 and 2019 the Company is controlled by Kazakhtelecom JSC. Kazakhtelecom JSC is controlled by the Government of the Republic of Kazakhstan through Sovereign Wealth Fund "Samruk-Kazyna" JSC ("Samruk-Kazyna") which owns 51% of Kazakhtelecom's controlling shares. As at 31 December 2020 and 31 December 2019, the shareholders of the Company are presented as follow:

	31 December 2020	31 December 2019
Kazakhtelecom JSC	**75.00%**	75.00%
Raiffeisenbank JSC	**11.60%**	11.82%
Other	**13.40%**	13.18%
	100.00%	100.00%

As at 31 December 2020 and 31 December 2019, the Company has the following principal subsidiaries:

	31 December 2020	31 December 2019
KazNet Media LLP	**100%**	75.00%
KT-Telecom LLP	**100%**	100.00%

The accompanying consolidated financial statements include the financial statement of Kcell JSC and its subsidiaries (further referred as to "the Group").

On 25 December 2010, the competent authority signed an addendum to the existing GSM license, which provided the Group with a right to operate a 3G network. In December 2010, the Group launched 3G services in Astana and Almaty. As of 1 January 2015, the Group provided all locations with a population of over 10,000 people with mobile services using UMTS/WCDMA based on the terms of the addendum.

In January 2016, the Group paid 14,000 million tenge as the first tranche for LTE radio frequencies. In accordance with the decision made by Kazakhstan's Ministry of Investments and Development ("the MID") in January 2016, the Group had to pay a one-time fee of 4,000 million tenge by 1 February 2016 for 10/10 MHz radio frequency within the 1700/1800 MHz band, and the first tranche of 10,000 million tenge by 1 March 2016 to gain access to 10/10 MHz radio frequency within the 700/800 MHz band. The second tranche for 10/10 MHz radio frequencies within the 700/800 MHz band in the amount of 12,000 million tenge was to be paid by 1 December 2016. The Group paid the second tranche on 30 November 2016. On 1 March 2016, the Group launched LTE in its network on the previously granted frequencies.

The consolidated financial statements were authorised for issue by the acting Chairman of the Management Board on 29 January 2021.

2. Basis of preparation

These consolidated financial statements of the Group have been prepared in accordance with International Financial Reporting Standards (hereinafter, "IFRS"), as issued by International Accounting Standard Board (hereinafter, "IASB").

These consolidated financial statements have been prepared on a historical cost basis, except as described in the accounting policies and the notes to these consolidated financial statements. The consolidated financial statements are presented in Kazakhstan tenge ("tenge") and all amounts are rounded to the nearest millions, except when otherwise indicated.

Going concern

The consolidated financial statements have been prepared on a going concern basis, which assumes continuation of the course of business, realization of assets and settlement of liabilities in the normal course of business.

Basis of consolidation

The consolidated financial statements comprise the financial statements of the Company and its subsidiaries as at 31 December 2020. Control is achieved when the Group is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee. Specifically, the Group controls an investee if, and only if, the Group has:

– Power over the investee (i.e., existing rights that give it the current ability to direct the relevant activities of the investee);

– Exposure, or rights, to variable returns from its involvement with the investee;

– The ability to use its power over the investee to affect its returns.

Generally, there is a presumption that a majority of voting rights results in control. To support this presumption and when the Group has less than a majority of the voting or similar rights of an investee, the Group considers all relevant facts and circumstances in assessing whether it has power over an investee, including:

– The contractual arrangement(s) with the other vote holders of the investee;

– Rights arising from other contractual arrangements;

– The Group's voting rights and potential voting rights.

The Group re-assesses whether or not it controls an investee if facts and circumstances indicate that there are changes to one or more of the three elements of control. Consolidation of a subsidiary begins when the Group obtains control over the subsidiary and ceases when the Group loses control of the subsidiary. Assets, liabilities, income and expenses of a subsidiary acquired or disposed of during the year are included in the consolidated financial statements from the date the Group gains control until the date the Group ceases to control the subsidiary.

Profit or loss and each component of other comprehensive income (OCI) are attributed to the equity holders of the parent of the Group and to the non-controlling interests, even if this results in the non-controlling interests having a deficit balance. When necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies in line with the Group's accounting policies. All intra-group assets and liabilities, equity, income, expenses and cash flows relating to transactions between members of the Group are eliminated in full on consolidation.

A change in the ownership interest of a subsidiary, without a loss of control, is accounted for as an equity transaction.

If the Group loses control over a subsidiary, it derecognises the related assets (including goodwill), liabilities, non controlling interest and other components of equity, while any resultant gain or loss is recognised in profit or loss. Any investment retained is recognised at fair value.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

3. Summary of significant accounting policies

New and amended standards and interpretations

The Group applied for the first-time certain standards and amendments, which are effective for annual periods beginning on or after 1 January 2020. The Group has not early adopted any standard, interpretation or amendment that has been issued but are not yet effective.

Amendments to IFRS 3 Definition of a Business

The amendment to IFRS 3 Business Combination clarifies that to be considered a business, an integrated set of activities and assets must include, at a minimum, an input and a substantive process that together significantly contribute to the ability to create output. Furthermore, it clarified that a business can exist without including all of the inputs and processes needed to create outputs. These amendments had no impact on the consolidated financial statements of the Group, but may impact future periods should the Group enter into any business combinations.

Amendments to IFRS 7, IFRS 9 and IAS 39 Interest Rate Benchmark Reform

The amendments to IFRS 9 and IAS 39 Financial Instruments: Recognition and Measurement provide a number of reliefs, which apply to all hedging relationships that are directly affected by interest rate benchmark reform. A hedging relationship i s affected if the reform gives rise to uncertainties about the timing and or amount of benchmark-based cash flows of the hedged item or the hedging instrument. These amendments had no impact on the consolidated financial statements of the Group as it does not have any interest rate hedge relationships.

Amendments to IAS 1 and IAS 8 Definition of Material

The amendments provide a new definition of material that states “information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity”. The amendments clarify that materiality will depend on the nature or magnitude of information, either individually or in combination with other information, in the context of the financial statements. A misstatement of information is material if it could reasonably be expected to influence decisions made by the primary users. These amendments had no impact on the consolidated financial statements of, nor is there expected to be any future impact to the Group.

Conceptual Framework for Financial Reporting issued on 29 March 2018

The Conceptual Framework is not a standard, and none of the concepts contained therein override the concepts or requirements in any standard. The purpose of the Conceptual Framework is to assist the IASB in developing standards, to help preparers develop consistent accounting policies where there is no applicable standard in place and to assist all parties to understand and interpret the standards. This will affect those entities which developed their accounting policies based on the Conceptual Framework. The revised Conceptual Framework includes some new concepts, updated definitions and recognition criteria for assets and liabilities and clarifies some important concepts. These amendments had no impact on the consolidated financial statements of the Group.

Amendments to IFRS 16 Covid-19 Related Rent Concessions

On 28 May 2020, the IASB issued Covid-19-Related Rent Concessions – amendment to IFRS 16 Leases. The amendments provide relief to lessees from applying IFRS 16 guidance on lease modification accounting for rent concessions arising as a direct consequence of the Covid-19 pandemic. As a practical expedient, a lessee may elect not to assess whether a Covid-19 related rent concession from a lessor is a lease modification. A lessee that makes this election accounts for any change in lease payments resulting from the Covid-19 related rent concession the same way it would account for the change under IFRS 16, if the change were not a lease modification.

The amendment applies to annual reporting periods beginning on or after 1 June 2020. Earlier application is permitted. This amendment had no impact on the consolidated financial statements of the Group.

Standards issued but not yet effective

The new and amended standards and interpretations that are issued, but not yet effective, up to the date of issuance of the Group’s financial statements are disclosed below. The Group intends to adopt these new and amended standards and interpretations, if applicable, when they become effective.

3. Summary of significant accounting policies (continued)

Standards issued but not yet effective (continued)

IFRS 17 Insurance Contracts

In May 2017, the IASB issued IFRS 17 Insurance Contracts (IFRS 17), a comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure. Once effective, IFRS 17 will replace IFRS 4 Insurance Contracts (IFRS 4) that was issued in 2005. IFRS 17 applies to all types of insurance contracts (i.e., life, non-life, direct insurance and re-insurance), regardless of the type of entities that issue them, as well as to certain guarantees and financial instruments with discretionary participation features.

A few scope exceptions will apply. The overall objective of IFRS 17 is to provide an accounting model for insurance contracts that is more useful and consistent for insurers. In contrast to the requirements in IFRS 4, which are largely based on grandfathering previous local accounting policies, IFRS 17 provides a comprehensive model for insurance contracts, covering all relevant accounting aspects. The core of IFRS 17 is the general model, supplemented by:

- A specific adaptation for contracts with direct participation features (the variable fee approach);
- A simplified approach (the premium allocation approach) mainly for short-duration contracts.

IFRS 17 is effective for reporting periods beginning on or after 1 January 2023, with comparative figures required. Early application is permitted, provided the entity also applies IFRS 9 and IFRS 15 on or before the date it first applies IFRS 17. This standard is not applicable to the Group.

Amendments to IAS 1 Classification of Liabilities as Current or Non-current

In January 2020, the IASB issued amendments to paragraphs 69 to 76 of IAS 1 to specify the requirements for classifying liabilities as current or non-current. The amendments clarify:

- What is meant by a right to defer settlement;
- That a right to defer must exist at the end of the reporting period;
- That classification is unaffected by the likelihood that an entity will exercise its deferral right;
- That only if an embedded derivative in a convertible liability is itself an equity instrument would the terms of a liability not impact its classification.

The amendments are effective for annual reporting periods beginning on or after 1 January 2023 and must be applied retrospectively. The Group is currently assessing the impact the amendments will have on current practice and whether existing loan agreements may require renegotiation.

Reference to the Conceptual Framework – Amendments to IFRS 3

In May 2020, the IASB issued Amendments to IFRS 3 Business Combinations – Reference to the Conceptual Framework. The amendments are intended to replace a reference to the Framework for the Preparation and Presentation of Financial Statements, issued in 1989, with a reference to the Conceptual Framework for Financial Reporting issued in March 2018 without significantly changing its requirements.

The Board also added an exception to the recognition principle of IFRS 3 to avoid the issue of potential 'day 2' gains or losses arising for liabilities and contingent liabilities that would be within the scope of IAS 37 or IFRIC 21 Levies, if incurred separately.

At the same time, the Board decided to clarify existing guidance in IFRS 3 for contingent assets that would not be affected by replacing the reference to the Framework for the Preparation and Presentation of Financial Statements.

The amendments are effective for annual reporting periods beginning on or after 1 January 2022 and apply prospectively.

Property, Plant and Equipment: Proceeds before Intended Use – Amendments to IAS 16

In May 2020, the IASB issued Property, Plant and Equipment – Proceeds before Intended Use, which prohibits entities deducting from the cost of an item of property, plant and equipment, any proceeds from selling items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, an entity recognises the proceeds from selling such items, and the costs of producing those items, in profit or loss.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

3. Summary of significant accounting policies (continued)

Standards issued but not yet effective (continued)

Property, Plant and Equipment: Proceeds before Intended Use – Amendments to IAS 16 (continued)

The amendment is effective for annual reporting periods beginning on or after 1 January 2022 and must be applied retrospectively to items of property, plant and equipment made available for use on or after the beginning of the earliest period presented when the entity first applies the amendment. The amendments are not expected to have a material impact on the Group.

Onerous Contracts – Costs of Fulfilling a Contract – Amendments to IAS 37

In May 2020, the IASB issued amendments to IAS 37 to specify which costs an entity needs to include when assessing whether a contract is onerous or loss-making.

The amendments apply a "directly related cost approach". The costs that relate directly to a contract to provide goods or services include both incremental costs and an allocation of costs directly related to contract activities. General and administrative costs do not relate directly to a contract and are excluded unless they are explicitly chargeable to the counterparty under the contract.

The amendments are effective for annual reporting periods beginning on or after 1 January 2022. The Group will apply these amendments to contracts for which it has not yet fulfilled all its obligations at the beginning of the annual reporting period in which it first applies the amendments.

IFRS 1 First-time Adoption of International Financial Reporting Standards – Subsidiary as a first-time adopter

As part of its 2018-2020 annual improvements to IFRS standards process, the IASB issued an amendment to IFRS 1 First-time Adoption of International Financial Reporting Standards. The amendment permits a subsidiary that elects to apply paragraph D16(a) of IFRS 1 to measure cumulative translation differences using the amounts reported by the parent, based on the parent's date of transition to IFRS. This amendment is also applied to an associate or joint venture that elects to apply paragraph D16(a) of IFRS 1.

The amendment is effective for annual reporting periods beginning on or after 1 January 2022 with earlier adoption permitted.

IFRS 9 Financial Instruments – Fees in the '10 per cent' test for derecognition of financial liabilities

As part of its 2018-2020 annual improvements to IFRS standards process the IASB issued amendment to IFRS 9. The amendment clarifies the fees that an entity includes when assessing whether the terms of a new or modified financial liability are substantially different from the terms of the original financial liability. These fees include only those paid or received between the borrower and the lender, including fees paid or received by either the borrower or lender on the other's behalf. An entity applies the amendment to financial liabilities that are modified or exchanged on or after the beginning of the annual reporting period in which the entity first applies the amendment.

The amendment is effective for annual reporting periods beginning on or after 1 January 2022 with earlier adoption permitted. The Group will apply the amendments to financial liabilities that are modified or exchanged on or after the beginning of the annual reporting period in which the entity first applies the amendment.

The amendments are not expected to have a material impact on the Group.

IAS 41 Agriculture – Taxation in fair value measurements

As part of its 2018-2020 annual improvements to IFRS standards process the IASB issued amendment to IAS 41 Agriculture. The amendment removes the requirement in paragraph 22 of IAS 41 that entities exclude cash flows for taxation when measuring the fair value of assets within the scope of IAS 41.

An entity applies the amendment prospectively to fair value measurements on or after the beginning of the first annual reporting period beginning on or after 1 January 2022 with earlier adoption permitted. This standard is not applicable to the Group.

3. Summary of significant accounting policies (continued)

Standards issued but not yet effective (continued)

Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 Interest Rate Benchmark Reform – Phase 2

In 2018, the IASB added a project to its agenda to consider the financial reporting implications of the Reform. It identified two groups of accounting issues that could have financial reporting implications. These were:

- Phase 1: pre-replacement issues – issues affecting financial reporting in the period before the replacement of an existing interest rate benchmark with an alternative RFR;
- Phase 2: replacement issues – issues that might affect financial reporting when an existing interest rate benchmark is replaced with an alternative RFR.

The IASB gave priority to the Phase 1 issues because they were more urgent and in September 2019, The Board issued Interest Rate Benchmark Reform, Amendments to IFRS 9, IAS 39 and IFRS 7 (the Phase 1 Amendments) to address them. The Phase 1 Amendments provided a number of temporary exceptions from applying specific hedge accounting requirements of both IFRS 9 Financial Instruments and IAS 39 Financial Instruments: Recognition and Measurement, but also added some additional disclosure requirements to IFRS 7 Financial Instruments: Disclosures.

In August 2020, the IASB issued Interest Rate Benchmark Reform Phase 2, Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 (the Phase 2 Amendments). The Phase 2 Amendments provide the following changes in respect of financial instruments that are directly required by the Reform:

- A practical expedient when accounting for changes in the basis for determining the contractual cash flows of financial assets and liabilities, to require the effective interest rate to be adjusted;
- Reliefs from discontinuing hedge relationships;
- Temporary relief from having to meet the separately identifiable requirement when an RFR instrument is designated as a hedge of a risk component;
- Additional IFRS 7 disclosures.

The Phase 2 Amendments also affected IFRS 16 Leases and IFRS 4 Insurance Liabilities.

The Phase 2 Amendments are effective for annual periods beginning on or after 1 January 2021 and early application is permitted. The amendments are not expected to have a material impact on the Group.

Foreign currency translation

The consolidated financial statements of the Group are presented in tenge, which is the functional currency of the Company and its main subsidiaries. Tenge is the currency of the primary economic environment in which the Company and its main subsidiaries operate. Each entity in the Group determines its own functional currency and items included in the financial statements of each entity are measured using that functional currency.

Transactions and balances

Transactions in foreign currencies are initially recorded by the Group's entities at their respective functional currency spot rates at the date the transaction first qualifies for recognition. Monetary assets and liabilities denominated in foreign currency are translated at the official exchange rate ruling at the reporting date established by Kazakhstan Stock Exchange ("KASE") and published by the National Bank of the Republic of Kazakhstan ("NBRK"). All translation differences are recognized in the consolidated statement of comprehensive income.

Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates as at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value is determined. The gain or loss arising on translation of non-monetary items measured at fair value is treated in line with the recognition of the gain or loss on the change in fair value of the item (i.e., translation differences on items whose fair value gain or loss is recognised in OCI or profit or loss are also recognised in OCI or profit or loss, respectively).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

3. Summary of significant accounting policies (continued)

Foreign currency translation (continued)

Transactions and balances (continued)

Foreign exchange rates are presented in the following table:

	31 December 2020	31 December 2019
US dollar	420.91	382.59
Euro	516.79	429.00
Russian rubles	5.62	6.16

Current versus non-current classification

The Group presents assets and liabilities in the consolidated statement of financial position based on current/non-current classification. An asset as current when it is:

– Expected to be realised or intended to sold or consumed in normal operating cycle;

– Held primarily for the purpose of trading;

– Expected to be realised within 12 (twelve) months after the reporting period; or

– Cash or cash equivalent unless restricted from being exchanged or used to settle a liability for at least 12 (twelve) months after the reporting period.

All other assets are classified as non-current.

A liability is current when:

– It is expected to be settled in normal operating cycle;

– It is held primarily for the purpose of trading;

– It is due to be settled within 12 (twelve) months after the reporting period; or

– There is no unconditional right to defer the settlement of the liability for at least 12 (twelve) months after the reporting period.

The Group classifies all other liabilities as non-current.

Deferred tax assets and liabilities are classified as non-current assets and liabilities.

Fair value measurement

Fair value related disclosures for financial instruments and non-financial assets that are measured at fair value or where fair values are disclosed, are summarised in the Note 32.

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

– In the principal market for the asset or liability; or

– In the absence of a principal market, in the most advantageous market for the asset or liability.

The principal or the most advantageous market must be accessible by the Group.

The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Group uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs.

3. Summary of significant accounting policies (continued)

Fair value measurement (continued)

All assets and liabilities for which fair value is measured or disclosed in the consolidated financial statements are categorised within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

- Level 1 – quoted (unadjusted) market prices in active markets for identical assets or liabilities;
- Level 2 – valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable;
- Level 3 – valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable.

For assets and liabilities that are recognised in the consolidated financial statements at fair value on a recurring basis, the Group determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period.

The respective unit of the Group (hereinafter, the "Working Group") determines the policies and procedures for both recurring fair value measurement, such as investment properties and unquoted AFS financial assets, and for non recurring measurement, such as assets held for distribution in discontinued operations. The composition of the Working Group is determined by the Management of the Group.

External valuers are involved for valuation of significant assets, such as investment properties and unquoted financial assets, and significant liabilities, such as contingent consideration. Involvement of external valuers is determined annually by the Working Group after discussion with and approval by the Group's Audit Committee. Selection criteria include market knowledge, reputation, independence and whether professional standards are maintained. Valuers are normally rotated every three years. The Working Group decides, after discussions with the Group's external valuers, which valuation techniques and inputs to use for each case.

At each reporting date, the Working Group analyses the movements in the values of assets and liabilities which are required to be remeasured or re-assessed as per the Group's accounting policies. For this analysis, the Valuation Committee verifies the major inputs applied in the latest valuation by agreeing the information in the valuation computation to contracts and other relevant documents.

The Working Group also compares the change in the fair value of each asset and liability with relevant external sources to determine whether the change is reasonable.

For the purpose of fair value disclosures, the Group has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability and the level of the fair value hierarchy, as explained above.

Property and equipment

Property and equipment is stated at cost, net of accumulated depreciation and accumulated impairment losses, if any. Such cost includes the cost of replacing part of the property and equipment and borrowing costs for long-term construction projects if the recognition criteria are met. When significant parts of property and equipment are required to be replaced at intervals, the Group depreciates them separately based on their specific useful lives. Likewise, when a major inspection is performed, its cost is recognised in the carrying amount of the property and equipment as a replacement if the recognition criteria are satisfied. All other repair and maintenance costs are recognised in profit or loss as incurred. The present value of the expected cost for the decommissioning of an asset after its use is included in the cost of the respective asset if the recognition criteria for a provision are met. Please refer to Asset retirement obligation (Note 19) for further information about decommissioning provision recognised.

Depreciation is calculated on a straight-line basis over the estimated useful lives of the assets, as follows:

	Years
Buildings and constructions	10-50
Machinery	3-10
Equipment, tools and installations	2-8

Land is not depreciated.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

3. Summary of significant accounting policies (continued)

Property and equipment (continued)

An item of property and equipment and any significant component initially recognised is derecognised upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the consolidated statement of comprehensive income when the asset is derecognised.

The residual values, useful lives and methods of depreciation of property and equipment are reviewed at each financial year end and adjusted prospectively, if appropriate.

Construction-in-progress

Construction-in-progress represents property and equipment under construction and machinery and equipment awaiting installation and is recorded at cost. Construction-in-progress includes cost of construction and equipment and other direct costs. When construction of such assets is completed or when the machinery and equipment are ready for their intended use, construction-in-progress is transferred to the appropriate category of depreciable assets. Construction-in-progress is not depreciated.

Intangible assets

Intangible assets acquired separately are measured on initial recognition at cost. The cost of intangible assets acquired in a business combination is their fair value at the date of acquisition. Following initial recognition, intangible assets are carried at cost less any accumulated amortisation and accumulated impairment losses. Internally generated intangibles, excluding capitalised development costs, are not capitalised and the related expenditure is reflected in profit or loss in the period in which the expenditure is incurred. Intangible assets have finite useful lives.

Intangible assets with finite useful lives are amortised over the useful economic life and assessed for impairment whenever there is an indication that the intangible asset may be impaired. The amortisation period and the amortisation method for an intangible asset with a finite useful life are reviewed at least at the end of each reporting period. Changes in the expected useful life or the expected pattern of consumption of future economic benefits embodied in the asset are considered to modify the amortisation period or method, as appropriate, and are treated as changes in accounting estimates. Expenses on amortization of intangible assets with finite useful life are recognized in the consolidated statement of comprehensive income in the category of expenses, which corresponds to the function of the intangible asset.

Gains or losses arising from derecognition of an intangible asset are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognised in the consolidated statement of comprehensive income when the asset is derecognised.

Intangible assets are amortized on a straight-line basis within the following estimated useful lives.

	Years
Software and license	3-8
Other telecom licenses	10
Other	8-10

Impairment of non-financial assets

The Group assesses at each reporting date whether there is an indication that an asset may be impaired. If any indication exists, or when annual impairment testing for an asset is required, the Group estimates the asset's recoverable amount. An asset's or cash-generating unit's (CGU) recoverable amount is the higher of: the fair value of an asset (cash generating unit) less costs of disposal and its value in use (cash generating unit). The recoverable amount is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or groups of assets. When the carrying amount of an asset or CGU exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount.

In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. In determining fair value less costs of disposal, recent market transactions are taken into account. If no such transactions can be identified, an appropriate valuation model is used. These calculations are corroborated by valuation multiples, quoted share prices for publicly traded companies or other available fair value indicators.

3. Summary of significant accounting policies (continued)

Impairment of non-financial assets (continued)

The Group bases its impairment calculation on detailed budgets and forecast calculations, which are prepared separately for each of the Group's CGUs to which the individual assets are allocated. These budgets and forecast calculations are generally covering a period of 5 (five) years. A long-term growth rate is calculated and applied to project future cash flows after the fifth year.

Impairment losses of continuing operations are recognised in the consolidated statement of comprehensive income in those expense categories consistent with the function of the impaired asset.

An assessment is made at each reporting date as to whether there is any indication that previously recognised impairment losses may no longer exist or may have decreased. If such indication exists, the Group estimates the asset's or CGU's recoverable amount. A previously recognised impairment loss is reversed only if there has been a change in the assumptions used to determine the asset's recoverable amount since the last impairment loss was recognised. The reversal is limited so that the carrying amount of the asset does not exceed its recoverable amount, nor exceed the carrying amount that would have been determined, net of depreciation, had no impairment loss been recognised for the asset in prior years. Such reversal is recognised in the consolidated statement of comprehensive income.

Financial assets

Initial recognition and measurement

Financial assets are classified, at initial recognition, as subsequently measured at amortised cost, fair value through other comprehensive income (OCI), and fair value through profit or loss.

The classification of financial assets at initial recognition depends on the financial asset's contractual cash flow characteristics and the Group's business model for managing them. With the exception of trade receivables that do not contain a significant financing component or for which the Group has applied the practical expedient, the Group initially measures a financial asset at its fair value plus, in the case of a financial asset not at fair value through profit or loss, transaction costs. Trade receivables that do not contain a significant financing component or for which the Group has applied the practical expedient are measured at the transaction price determined under IFRS 15.

In order for a financial asset to be classified and measured at amortised cost or fair value through OCI, it needs to give rise to cash flows that are 'solely payments of principal and interest (SPPI)' on the principal amount outstanding. This assessment is referred to as the SPPI test and is performed at an instrument level. Financial assets with cash flows that are not SPPI are classified and measured at fair value through profit or loss, irrespective of the business model.

The Group's business model for managing financial assets refers to how it manages its financial assets in order to generate cash flows. The business model determines whether cash flows will result from collecting contractual cash flows, selling the financial assets, or both. Financial assets classified and measured at amortised cost are held within a business model with the objective to hold financial assets in order to collect contractual cash flows while financial assets classified and measured at fair value through OCI are held within a business model with the objective of both holding to collect contractual cash flows and selling.

Purchases or sales of financial assets that require delivery of assets within a time frame established by regulation or convention in the market place (regular way trades) are recognised on the trade date, i.e., the date that the Group commits to purchase or sell the asset.

Financial assets of the Group include cash and cash equivalents, trade and other accounts receivable, financial asset at fair value through other comprehensive income.

Subsequent measurement

For purposes of subsequent measurement financial assets are classified in four categories:

- Financial assets at amortised cost (debt instruments);
- Financial assets at fair value through OCI with recycling of cumulative gains and losses (debt instruments);
- Financial assets designated at fair value through OCI with no recycling of cumulative gains and losses upon derecognition (equity instruments);
- Financial assets at fair value through profit or loss.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

3. Summary of significant accounting policies (continued)

Financial assets (continued)

Subsequent measurement (continued)

Financial assets at amortised cost (debt instruments)

This category is the most relevant to the Group. The Group measures financial assets at amortised cost if both of the following conditions are met:

- The financial asset is held within a business model with the objective to hold financial assets in order to collect contractual cash flows; and
- The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Financial assets at amortised cost are subsequently measured using the effective interest (EIR) method and are subject to impairment. Gains and losses are recognised in profit or loss when the asset is derecognised, modified or impaired.

The Group's financial assets at amortised cost includes trade and other receivables.

Financial assets designated at fair value through OCI (equity instruments)

Upon initial recognition, the Group can elect to classify irrevocably its equity investments as equity instruments designated at fair value through OCI when they meet the definition of equity under IAS 32 Financial Instruments: Presentation and are not held for trading. The classification is determined on an instrument-by-instrument basis.

Gains and losses on these financial assets are never recycled to profit or loss. Dividends are recognised as other income in the statement of profit or loss when the right of payment has been established, except when the Group benefits from such proceeds as a recovery of part of the cost of the financial asset, in which case, such gains are recorded in OCI. Equity instruments designated at fair value through OCI are not subject to impairment assessment.

The Group elected to classify irrevocably its non-listed equity investments under this category.

Derecognition

A financial asset (or, where applicable a part of a financial asset or part of a group of similar financial assets) is derecognized (i.e. excluded from the Group's consolidated statement of financial position):

- The rights to receive cash flows from the asset have expired; or
- The Group has transferred its rights to receive cash flows from the asset or has assumed an obligation to pay the received cash flows in full without material delay to a third party under a "pass-through" arrangement; and either (a) the Group has transferred substantially all the risks and rewards of the asset, or (b) the Group has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.

When the Group has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement, the Group evaluates if it has retained the risks and rewards of the property, and to which extent, if any. When it has neither transferred nor retained substantially all of the risks and rewards of the asset, nor transferred control of the asset, the Group continues to recognise the transferred asset to the extent of its continuing involvement. In that case, the Group also recognises an associated liability. The transferred asset and the associated liability are measured on a basis that reflects the rights and obligations that the Group has retained.

Continuing involvement that takes the form of a guarantee over the transferred asset is measured at the lower of the original carrying amount of the asset and the maximum amount of consideration that the Group could be required to repay.

3. Summary of significant accounting policies (continued)

Financial assets (continued)

Impairment of financial assets

Financial assets carried at amortised cost

The Group recognises an allowance for expected credit losses (ECLs) for all debt instruments not held at fair value through profit or loss. ECLs are based on the difference between the contractual cash flows due in accordance with the contract and all the cash flows that the Group expects to receive, discounted at an approximation of the original effective interest rate. The expected cash flows will include cash flows from the credit enhancements that are integral to the contractual terms.

ECLs are recognised in two stages. For credit exposures for which there has not been a significant increase in credit risk since initial recognition, ECLs are provided for credit losses that result from default events that are possible within the next 12-months (a 12-month ECL). For those credit exposures for which there has been a significant increase in credit risk since initial recognition, a loss allowance is required for credit losses expected over the remaining life of the exposure, irrespective of the timing of the default (a lifetime ECL).

For trade receivables the Group applies a simplified approach in calculating ECLs. Therefore, the Group does not track changes in credit risk, but instead recognises a loss allowance based on lifetime ECLs at each reporting date. The Group has established a provision matrix that is based on its historical credit loss experience, adjusted for forward-looking factors specific to the debtors and the economic environment.

The Group considers a financial asset in default when contractual payments are 90 days past due. However, in certain cases, the Group may also consider a financial asset to be in default when internal or external information indicates that the Group is unlikely to receive the outstanding contractual amounts in full before taking into account any credit enhancements held by the Group. A financial asset is written off when there is no reasonable expectation of recovering the contractual cash flows.

Financial liabilities

Initial recognition and measurement

Financial liabilities are classified, at initial recognition, as financial liabilities at fair value through profit or loss, loans and borrowings, payables.

All financial liabilities are recognised initially at fair value and, in the case of loans and borrowings and payables, net of directly attributable transaction costs.

The Group's financial liabilities comprise trade and other accounts payable, loans and borrowings, lease liabilities and financial guarantees.

Subsequent measurement

The subsequent measurement of financial liabilities depends on their classification, as described below:

Loans and borrowings

This category is the most relevant to the Group. After initial recognition, interest-bearing loans and borrowings are subsequently measured at amortised cost using the EIR method. Gains and losses are recognised in profit or loss when the liabilities are derecognised as well as through the EIR amortisation process.

Amortised cost is calculated by taking into account any discount or premium on acquisition and fee or costs that are an integral part of the EIR. The EIR amortisation is included in finance costs in the consolidated statement of comprehensive income.

This category generally applies to interest-bearing loans and borrowings. Further details are contained in Note 17.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

3. Summary of significant accounting policies (continued)

Financial liabilities (continued)

Subsequent measurement (continued)

Financial guarantees

The Group has financial guarantee issued to the Parent. Financial guarantee contracts are recognised initially as a liability at fair value, adjusted for transaction costs that are directly attributable to the issuance of the guarantee. The financial guarantee obligation issued to the Parent is initially recognized though equity. Subsequently, the liability is measured at the higher of the amount of the loss allowance determined in accordance with IFRS 9 Financial Instruments and the amount initially recognised less, when appropriate, the cumulative amount of income recognised in accordance with IFRS 15 Revenue from Contracts with Customers. Further details are contained in Note 20.

Trade and other accounts payable

Liabilities for trade and other accounts payable are recognised at fair value to be paid in the future for goods and services received, whether or not billed to the Group.

Derecognition

A financial liability is derecognised when the obligation under the liability is discharged or cancelled or expires. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as the derecognition of the original liability and the recognition of a new liability. The difference in the respective carrying amounts is recognised in the consolidated statement of comprehensive income.

Offsetting of financial instruments

Financial assets and financial liabilities are only offset and reported at the net amount in the consolidated statement of financial position when there is a legally enforceable right to offset the recognised amounts and the Group intends to either settle on a net basis, to realise the asset and settle the liability simultaneously.

Leases

The Group assesses at contract inception whether a contract is, or contains, a lease. That is, if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

Group as a lessee

The Group applies a single recognition and measurement approach for all leases, except for short-term leases and leases of low-value assets. The Group recognises lease liabilities to make lease payments and right-of-use assets representing the right to use the underlying assets.

Right-of-use assets

The Group recognises right-of-use assets at the commencement date of the lease (i.e., the date the underlying asset is available for use). Right-of-use assets are measured at cost, less any accumulated depreciation and impairment losses, and adjusted for any remeasurement of lease liabilities. The cost of right-of-use assets includes the amount of lease liabilities recognised, initial direct costs incurred, and lease payments made at or before the commencement date less any lease incentives received.

The right-of-use assets are depreciated on a straight-line basis over the shorter of its estimated useful life and the lease term, as follows:

	Years
Buildings and constructions	5-15

If ownership of the leased asset transfers to the Group at the end of the lease term or the cost reflects the exercise of a purchase option, depreciation is calculated using the estimated useful life of the asset.

The right-of-use assets are also subject to impairment. Refer to the accounting policies in section Impairment of non financial assets.

3. Summary of significant accounting policies (continued)

Leases (continued)

Group as a lessee (continued)

Lease liabilities

At the commencement date of the lease, the Group recognises lease liabilities measured at the present value of lease payments to be made over the lease term. The lease payments include fixed payments (including insubstance fixed payments) less any lease incentives receivable, variable lease payments that depend on an index or a rate, and amounts expected to be paid under residual value guarantees. The lease payments also include the exercise price of a purchase option reasonably certain to be exercised by the Group and payments of penalties for terminating the lease, if the lease term reflects the Group exercising the option to terminate. Variable lease payments that do not depend on an index or a rate are recognised as expenses (unless they are incurred to produce inventories) in the period in which the event or condition that triggers the payment occurs.

In calculating the present value of lease payments, the Group uses its incremental borrowing rate at the lease commencement date because the interest rate implicit in the lease is not readily determinable. After the commencement date, the amount of lease liabilities is increased to reflect the accretion of interest and reduced for the lease payments made. In addition, the carrying amount of lease liabilities is remeasured if there is a modification, a change in the lease term, a change in the lease payments (e.g., changes to future payments resulting from a change in an index or rate used to determine such lease payments) or a change in the assessment of an option to purchase the underlying asset.

Short-term leases

The Group applies the short-term lease recognition exemption to its short-term leases of base station that have a lease term of 12 months or less from the commencement date and the lessor has unconditional right to terminate contract. Lease payments on short-term leases are recognised as expense on a straight-line basis over the lease term.

Inventories

Inventories are valued at the lower of: cost of acquisition and net realisable value.

Cost comprise expenses incurred in bringing inventory to its present location and condition. Net realisable value is the estimated selling price in the ordinary course of business, less estimated costs of completion and the estimated costs necessary to make the sale. The same cost formula is used for all inventories having a similar nature and use. All inventories are determined based on weighted average cost method.

Provisions

General

Provisions are recognised when the Group has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. When the Group expects some or all of a provision to be reimbursed, for example, under an insurance contract, the reimbursement is recognised as a separate asset, but only when the reimbursement is virtually certain. The expense relating to a provision is presented in the statement of profit or loss net of any reimbursement. If the effect of the time value of money is material, provisions are discounted using a current pre tax rate that reflects, when appropriate, the risks specific to the liability. When discounting is used, the increase in the provision due to the passage of time is recognised as a finance cost.

Decommissioning liability

Decommissioning liabilities are recognized in respect of the estimated future costs of closure and restoration and for environmental rehabilitation costs (which include the dismantling and demolition of infrastructure, removal of residual materials and remediation of disturbed areas) in the reporting period when the related environmental disturbance occurs. Decommissioning costs are recorded at the discounted value of expected liability settlement costs calculated using estimated cash flows and recognized as part of the initial cost of the particular asset. Cash flows are discounted at the current rate before tax, which reflects risks inherent to the decommissioning obligations. Unwinding of discount is expensed as incurred and recognised in the consolidated statement of comprehensive income as finance costs. The estimated future costs of decommissioning are reviewed annually and adjusted as appropriate. Changes in the estimated future costs, or in the discount rate applied, are added to or deducted from the cost of the asset.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

3. Summary of significant accounting policies (continued)

Employee benefit

Social tax

The Group pays social tax according to the current statutory requirements of the Republic of Kazakhstan. Social tax expenses are charged to expenses as incurred.

Besides, the Group withholds 10% of the salary of employees paid as contributions of employees to the accumulating pension funds. Under the legislation, employees are responsible for their retirement benefits and the Group has no present or future obligation to further compensate its employees upon their retirement, except as provided below.

Pension payments

The Group does not incur any expenses in relation to provision of pensions or other post-employment benefits to its employees. In accordance with the legal requirements of the Republic of Kazakhstan, the Group withholds pension contributions from employee salaries and transfers them into state or private pension funds on behalf of its employees. Pension contributions are the responsibility of employees, and the Group has no current or future obligations to make payments to employees following their retirement. Upon retirement of employees, all pension payments are administered by the pension funds directly.

Cash dividend and non-cash distribution to equity holders of the Parent

The Group recognises a liability to make cash or non-cash distributions to equity holders of the Parent when the distribution is authorised and the distribution is no longer at the discretion of the Group. According to the legislation, distribution is approved by the shareholders. A corresponding amount is recognised directly in equity.

Non-cash distributions are measured at the fair value of the assets to be distributed with fair value remeasurement recognised directly in equity.

Upon distribution of non-cash assets, any difference between the carrying amount of the liability and the carrying amount of the assets distributed is recognised in the consolidated statement of comprehensive income.

Revenue from contracts with customers

Revenue from contracts with customers is recognized when control of the goods or services are transferred to the customer at an amount that reflects the consideration to which the Group expects to be entitled in exchange for those goods or services.

Revenue is categorised as follows: voice and other services, data services, value added services, and sale of handsets.

Voice service includes call out revenue, interconnect fees, roaming revenues charged to the Group's subscribers for roaming in other wireless operators' network, and roaming revenues charged to other wireless operators for non-Group subscribers using the Group's network.

Data services include revenues from 3G and LTE internet, WAP services and other data services.

Value added services consists of SMS, MMS, info services and providing content of third parties, fax and voice mail services.

The Group may bundle services and products into one customer offering. Offerings may involve the delivery or performance of multiple products, services, or rights to use assets (multiple deliverables). In some cases, the arrangements include initial installation, initiation, or activation services and involve consideration in the form of a fixed fee or a fixed fee coupled with a continuing payment stream. Costs associated with the equipment are recognised when revenue is recognised. The revenue is allocated to separate product and services on a relative stand-alone selling price method.

The stand-alone selling prices are determined based on the list prices at which the Group sells the mobile devices and telecommunication services. Customised equipment that can be used only in connection with services or products provided by the Group is not accounted for separately and revenue is deferred over the total service arrangement period.

In revenue arrangements where more than one performance obligation, transaction price is allocated between the goods and services using relative stand-alone selling price method. Determining the transaction price for each separate performance obligation can require complex estimates. The Group generally determines the stand-alone selling price for each separate performance obligation based on prices at which the good or services are regularly sold on a stand-alone basis after considering volume discounts where appropriate.

3. Summary of significant accounting policies (continued)

Revenue from contracts with customers (continued)

As a practical expedient, the Group does not adjust the promised amount of consideration for the effects of a significant financing component if the Group expects, at contract inception, that the period between when the Group transfers a promised good or service to a customer and when the customer pays for that good or service will be one year or less.

(i) Call out revenue

Call out revenue is recognised based on the actual airtime used by the subscribers. Prepayments received for call out revenue are not recognised as revenue until the related service has been provided to the subscriber. Revenue is recognised based on the actual traffic time elapsed, at the customer selected calling plan rates.

(ii) Interconnect revenues and costs

The Group charges interconnect per minute fees and fixed monthly payments to other local wireless and fixed line operators for calls originated outside and terminated within the Group's network. The Group recognises such revenues when the services are provided. The Group is charged interconnect fees per minute and fixed monthly payments by other local wireless and fixed line operators for calls originated within the Group's network and terminated outside of the network. The Group recognises such costs when the services are provided.

(iii) Data revenue

The data service is recognised when a service is used by a subscriber based on actual data volume traffic or passage of time (monthly subscription fee).

(iv) Roaming revenues charged to the Group's subscribers

Roaming revenue from the Group's subscribers for roaming in other operators' network is charged based on information provided by other operators to the Group.

(v) Roaming fees charged to other wireless operators

The Group charges roaming per minute fees to other wireless operators for non-Group subscribers utilising the Group's network. The Group recognises such revenues when the services are provided.

(vi) Value added services

Value added services mainly consists of content provided by third parties, different info services, fax and voice mail. When invoicing the end-customer for third party content service, amounts collected on behalf of the principal are excluded from revenue.

Roaming discounts

The Group enters into roaming discount agreements with a number of wireless operators. According to the terms of the agreements the Group is obliged to provide and entitled to receive a discount that is generally dependent on the volume of inter operator roaming traffic. The Group uses various estimates and assumptions, based on historical data and adjusted for known changes, to determine the amount of discount to be received or granted. Such estimates are adjusted monthly to reflect newly-available information.

The Group accounts for discounts received as a reduction of roaming expenses and discounts granted as reduction of roaming revenue. The Group considers terms of the various roaming discount agreements to determine the appropriate presentation of amount of receivable from and payable to its roaming partners in its consolidated statements of financial position.

Costs to obtain a contract

The Group sells part of payment scratch cards, sim cards, and handsets using dealers. The Group pays a certain commission to dealers depending on the number of payment scratch cards, sim cards or handset sold. Sales commissions and equipment subsidies granted to dealers for obtaining a specific contract are capitalised and deferred over the period over which the Group expects to provide services to the customer. Other commissions to dealers are recognised when the item is sold to the subscriber.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)
For the year ended 31 December 2020

3. Summary of significant accounting policies (continued)

Contract balances

Contract assets
A contract asset is the right to consideration in exchange for goods or services transferred to the customer. If the Group performs by transferring goods or services to a customer before the customer pays consideration or before payment is due, a contract asset is recognised for the earned consideration that is conditional.

Trade receivables
A receivable is recognised if an amount of consideration that is unconditional is due from the customer (i.e., only the passage of time is required before payment of the consideration is due). Refer to accounting policies of financial assets in section "Financial instruments – initial recognition and subsequent measurement".

Contract liabilities
A contract liability is recognised if a payment is received or a payment is due (whichever is earlier) from a customer before the Group transfers the related goods or services. Contract liabilities are recognised as revenue when the Group performs under the contract (i.e., transfers control of the related goods or services to the customer).

Interest income
For all financial instruments measured at amortised cost and interest-bearing financial assets classified as AFS, interest income is recorded using the effective interest rate (EIR). The EIR is the rate that exactly discounts the estimated future cash receipts over the expected life of the financial instrument or a shorter period, where appropriate, to the net carrying amount of the financial asset. The interest income is recorded as part of finance income in the consolidated statement of comprehensive income.

Dividends
Revenue is recognised when the Group's right to receive the payment is established, which is generally when shareholders approve the dividend.

Expense recognition
Expenses are recognized as incurred and reported in the consolidated statement of comprehensive income in the period to which they relate on the accrual basis.

Borrowing costs
Borrowing costs directly attributable to the acquisition, construction or production of an asset that necessarily takes a substantial period of time to get ready for its intended use or sale are capitalised as part of the cost of the asset. All other borrowing costs are expensed in the period in which they occur. Borrowing costs consist of interest and other costs that an entity incurs in connection with the borrowing of funds.

Taxes

Current income tax
Current income tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted at the reporting date in the countries where the Group operates and generates taxable income.

Current income tax relating to items recognised directly in equity is recognised in equity and not in the statement of profit or loss. Management periodically evaluates positions taken in the tax returns with respect to situations in which applicable tax regulations are subject to interpretation and establishes provisions where appropriate.

Deferred tax
Deferred tax is provided using the liability method on temporary differences between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes at the reporting date.

3. Summary of significant accounting policies (continued)

Taxes (continued)

Deferred tax (continued)

Deferred tax liabilities are recognized for all taxable temporary differences, except:

– When the deferred tax liability arises from the initial recognition of goodwill or an asset or liability in transaction that is not a business combination and, at the same time of transaction, affects neither the accounting profit nor taxable profit or loss;

– In respect of taxable temporary differences associated with investments in subsidiaries, associates and interests in joint arrangements, when the timing of the reversal of the temporary differences can be controlled and it is probable that the temporary differences will not reverse in the foreseeable future.

Deferred tax assets are recognised for all deductible temporary differences, the carry forward of unused tax credits and any unused tax losses. Deferred tax assets are recognised to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilised, except:

– When the deferred tax asset relating to the deductible temporary difference arises from the initial recognition of an asset or liability in a transaction that is not a business combination and, at the time of the transaction, affects neither the accounting profit nor taxable profit or loss;

– In respect of deductible temporary differences associated with investments in subsidiaries, associates and interests in joint arrangements, deferred tax assets are recognised only to the extent that it is probable that the temporary differences will reverse in the foreseeable future and taxable profit will be available against which the temporary differences can be utilized.

The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax asset to be utilised. Unrecognised deferred tax assets are re-assessed at each reporting date and are recognised to the extent that it has become probable that future taxable profits will allow the deferred tax asset to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the year when the asset is realised or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantively enacted at the reporting date.

Deferred tax relating to items recognised outside profit or loss is recognised outside profit or loss. Deferred tax items are recognised in correlation to the underlying transaction either in OCI or directly in equity.

The Group offsets deferred tax assets and deferred tax liabilities if and only if it has a legally enforceable right to set off current tax assets and current tax liabilities and the deferred tax assets and deferred tax liabilities relate to income taxes levied by the same taxation authority on either the same taxable entity or different taxable entities which intend either to settle current tax liabilities and assets on a net basis, or to realise the assets and settle the liabilities simultaneously, in each future period in which significant amounts of deferred tax liabilities or assets are expected to be settled or recovered.

Contingent assets and liabilities

Contingent assets are not recognized in the consolidated financial statements. Where an inflow of economic benefits is probable, they are disclosed.

Contingent liabilities are not recognized in the consolidated financial statements unless an outflow of resources embodying economic benefits has become probable. They are disclosed unless the possibility of an outflow of resources embodying economic benefits is remote.

Related parties

In accordance with IAS 24 Related Party Disclosures, parties are considered to be related if one party has the ability to control the other party or exercise significant influence over the other party in making financial or operational decisions.

Transactions with related parties are used to reflect the status of settlements for property, works and services received from companies or sold to companies that are related parties to the Group. Items of a similar nature are disclosed in aggregate except when separate disclosure is necessary for an understanding of the effects of related party transactions on the consolidated financial statements.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

4. Restatement of comparative information

Change in accounting policies

Certain amounts in the consolidated statements of financial position as at 31 December 2019 and 1 January 2019, consolidated financial statements of comprehensive income for the year ended 31 December 2019 and consolidated statements of cash flows for the year ended 31 December 2019 were restated to reflect the effect of changes in the accounting policy as a result of adoption of the IFRIC agenda decision, as described below.

IFRS Interpretations Committee's agenda decision on cancellable or renewable leases, and related non-removable leasehold improvements

In November 2019, the IFRS Interpretations Committee published an agenda decision on cancellable or renewable leases, and related non-removable leasehold improvements. The conclusions are summarized below:

Lease term

The IFRS Interpretations Committee noted that, in determining the enforceable period of the lease, an entity considers:

- The broader economic sand not only the contractual termination payments. For example, if either party has an economic incentive not to terminate the lease such that it would incur a penalty on termination that is more than insignificant, the contract is enforceable beyond the date on which the contract can be terminated;

- Whether each of the parties has the right to terminate the lease without permission of the other party with no more than an insignificant penalty. A lease is no longer enforceable only when both parties have such a right. Consequently, if only one party has the right to terminate the lease without permission from the other party with no more than an insignificant penalty, the contract is enforceable beyond the date on which the contract can be terminated by that party.

If an entity concludes that the contract is enforceable beyond the notice period of a cancellable lease, it should assess whether the lessee is reasonably certain not to exercise the option to terminate the lease.

Useful life of non-removable leasehold improvements

An entity applies IAS 16 in determining the useful life of non-removable leasehold improvements. If the lease term of the related lease is shorter than the economic life of those leasehold improvements, the entity considers whether it expects to use the leasehold improvements beyond that lease term. If the entity does not expect to do so, then, applying IAS 16, it concludes that the useful life of the non-removable leasehold improvements is the same as the lease term. Since the Group's current practice is in line with this clarification, it will not impact on the interim condensed consolidated financial statements of the Group.

This IFRIC agenda decision should be applied retrospectively and are effective immediately from date of its publication in November 2019.

Effect of agenda decision on the Group accounting policy

The Group re-assessed its accounting for the lease contracts of technical sites with the governmental entities which were previously recognized as short-term leases as the Group applied recognition exemptions for short-term leases as in accordance with paragraph 5 of IFRS 16.

As the Group applies the agenda decision it considers all relevant facts and circumstances that create an economic incentive for the lessee but not only contractual termination penalties, in assessing whether the Group is reasonably certain to extend (or not to terminate) a lease. The Group determined the lease term for technical sites lease contracts with the governmental entities equaled to average useful lives of cellular network stations.

The Group adopted the agenda decision and retrospectively recalculated lease contracts with governmental entities effective as at 1 January 2019, the Group's date of adoption IFRS 16.The right-of-use assets for the leases were recognised based on the carrying amount as if the agenda decision had always been applied, apart from the use of incremental borrowing rate at the date of initial application. Lease liabilities were recognised based on the present value of the remaining lease payments, discounted using the incremental borrowing rate at the date of initial application.

4. Restatement of comparative information (continued)

Change in accounting policies (continued)

IFRS Interpretations Committee's agenda decision on cancellable or renewable leases, and related non-removable leasehold improvements (continued)

Effect of agenda decision on the Group accounting policy (continued)

The effect of changes in the accounting policy is disclosed below.

In millions of tenge	As previously reported	Change in accounting policy	Correction of errors	Note	As restated
Consolidated statement of financial position as at 31 December 2019					
Non-current assets					
Right-of-use assets	23,067	1,909	–	1	24,976
Total non-current assets	**147,142**	**1,909**	**–**		**149,051**
Current assets					
Prepaid income tax	30	–	2,192	2	2,222
Total current assets	**44,178**	**–**	**2,192**		**46,370**
Total assets	**191,320**	**1,909**	**2,192**		**195,421**
Equity					
Retained earnings	37,771	(261)	2,787	1	40,297
Total equity	**71,571**	**(261)**	**2,787**		**74,097**
Non-current liabilities					
Long-term lease liabilities	21,619	1,828	–	1	23,447
Deferred tax liabilities	1,248	(65)	–	1	1,183
Total non-current liabilities	**80,385**	**1,763**	**–**		**82,148**
Current liabilities					
Short term lease liabilities	3,199	407	–	1	3,606
Income tax payable	595	–	(595)	2	–
Total current liabilities	**39,364**	**407**	**(595)**		**39,176**
Total liabilities	**119,749**	**2,170**	**(595)**		**121,324**
Total equity and liabilities	**191,320**	**1,909**	**2,192**		**195,421**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

4. Restatement of comparative information (continued)

Change in accounting policies (continued)

IFRS Interpretations Committee's agenda decision on cancellable or renewable leases, and related non-removable leasehold improvements (continued)

Effect of agenda decision on the Group accounting policy (continued)

The effect of changes in the accounting policy is disclosed below.

In millions of tenge	As previously reported	Change in accounting policy	Correction of errors	Note	As restated
Consolidated statement of financial position as at 1 January 2019					
Non-current assets					
Right-of-use assets	24,070	3,746	–	1	27,816
Total non-current assets	**156,787**	**3,746**	**–**		**160,533**
Current assets					
Prepaid income tax	–	–	933	2	933
Total current assets	**30,831**	**–**	**933**		**31,764**
Total assets	**187,618**	**3,746**	**933**		**192,297**
Equity					
Retained earnings	33,626	(159)	2,787	1	36,254
Total equity	**67,426**	**(159)**	**2,787**		**70,054**
Non-current liabilities					
Long-term lease liabilities	22,192	2,992	–	1	25,184
Deferred tax liabilities	1,342	(40)	–	1	1,302
Total non-current liabilities	**39,832**	**2,952**	**–**		**42,784**
Current liabilities					
Short term lease liabilities	2,689	953	–	2	3,642
Income tax payable	1,854	–	(1,854)	2	–
Total current liabilities	**80,360**	**953**	**(1,854)**		**79,459**
Total liabilities	**120,192**	**3,905**	**(1,854)**		**122,243**
Total equity and liabilities	**187,618**	**3,746**	**933**		**192,297**

In millions of tenge	As previously reported	Change in accounting policy	Note	As restated
Consolidated statement of comprehensive income for the year ended 31 December 2019				
Cost of sales	(109,195)	267	1	(108,928)
Gross profit	**47,462**	**267**		**47,729**
Operating profit	**22,814**	**267**		**23,081**
Finance costs	(11,500)	(395)	1	(11,895)
Profit before income tax	**12,870**	**(128)**		**12,742**
Income tax expenses	(2,753)	26	1	(2,727)
Total comprehensive income for the year, net of tax	**10,117**	**(102)**		**10,015**

4. Restatement of comparative information (continued)

Change in accounting policies (continued)

IFRS Interpretations Committee's agenda decision on cancellable or renewable leases, and related non-removable leasehold improvements (continued)

Effect of agenda decision on the Group accounting policy (continued)

In millions of tenge	As previously reported	Change in accounting policy	Note	As restated
Consolidated statement of cash flows for the year ended 31 December 2019				
Profit before tax	12,870	(128)	1	12,742
Adjustments for:				
Finance costs	11,500	395	1	11,895
Depreciation of property and equipment and right of use assets	20,558	564	1	21,122
Operating cash flows before changes in operating assets and liabilities	**51,268**	**831**		**52,099**
Cash flows generated from operations	47,359	831		48,190
Interest paid	(9,825)	(395)	1	(10,220)
Net cash flows from operating activities	**34,625**	**436**		**35,061**
Repayment of principal portion of lease liabilities	(2,649)	(436)	1	(3,085)
Net cash flows used in financing activities	**(13,596)**	**(436)**		**(14,032)**
Net increase in cash and cash equivalents	**2,847**	**–**		**2,847**

1 The Group adopted IFRS Interpretations Committee's agenda decision on cancellable or renewable leases, and related non-removable leasehold improvements and restated the comparative information as required by IAS 8.

2 In 2020 the Group revised the calculation of income tax recognized by the Group in its 2015-2018 consolidated financial statements for the purpose of the re-submission of income tax declarations for 2015-2018 periods, and as a result, the Group identified certain errors in calculation of income tax related to 2015-2018 periods. Identified errors are mainly related with delay in receipt of fiscal documents and long reconciliation process between the Group and its counterparties.

All the disclosure amounts within the comparative information were changed respectively.

5. Critical accounting judgements, estimates and assumptions

The preparation of the Group's consolidated financial statements requires management to make judgements, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the accompanying disclosures, and the disclosure of contingent liabilities. Uncertainty about these assumptions and estimates could result in outcomes that require a material adjustment to the carrying amount of assets or liabilities affected in future periods.

Other disclosures relating to the Group's exposure to risks and uncertainties includes:

– Financial instruments and financial risk management objectives and principles Note 32.

Estimates and assumptions

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year, are described below. The Group based its assumptions and estimates on parameters available when the consolidated financial statements were prepared. Existing circumstances and assumptions about future developments, however, may change due to market changes or circumstances arising that are beyond the control of the Group. Such changes are reflected in the assumptions when they occur.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

5. Critical accounting judgements, estimates and assumptions (continued)

Judgements

In the process of applying the Group's accounting policies, management has made the following judgements, which have the most significant effect on the amounts recognised in the consolidated financial statements:

Determining the lease term of contracts with renewal and termination options – Group as lessee

The Group determines the lease term as the non-cancellable term of the lease, together with any periods covered by an option to extend the lease if it is reasonably certain to be exercised, or any periods covered by an option to terminate the lease, if it is reasonably certain not to be exercised.

The Group has several lease contracts that include extension and termination options. The Group applies judgement in evaluating whether it is reasonably certain whether or not to exercise the option to renew or terminate the lease. That is, it considers all relevant factors that create an economic incentive for it to exercise either the renewal or termination. After the commencement date, the Group reassesses the lease term if there is a significant event or change in circumstances that is within its control and affects its ability to exercise or not to exercise the option to renew or to terminate (e.g., construction of significant leasehold improvements or significant customisation to the leased asset).

Leases – estimating the incremental borrowing rate

The Group cannot readily determine the interest rate implicit in the lease, therefore, it uses its incremental borrowing rate (IBR) to measure lease liabilities. The IBR is the rate of interest that the Group would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right-of-use asset in a similar economic environment. The IBR therefore reflects what the Group 'would have to pay', which requires estimation when no observable rates are available (such as for subsidiaries that do not enter into financing transactions) or when they need to be adjusted to reflect the terms and conditions of the lease (for example, when leases are not in the subsidiary's functional currency). The Group estimates the IBR using observable inputs (such as market interest rates) when available and is required to make certain entity-specific estimates (such as the subsidiary's stand-alone credit rating).

Useful lives of property and equipment and intangible assets

The Group assesses the remaining useful lives of items of property and equipment and intangible assets at least at each financial year-end and, if expectations differ from previous estimates, the changes are accounted for as a change in an accounting estimate in accordance with IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors.

Impairment of non-financial assets

Impairment exists when the carrying value of an asset or cash generating unit exceeds its recoverable amount, which is the higher of its fair value less costs of disposal and its value in use. The fair value less costs of disposal calculation is based on available data from binding sales transactions, conducted at arm's length, for similar assets or observable market prices less incremental costs of disposing of the asset. The value in use calculation is based on a DCF model. The cash flows are derived from the budget for the next five years and do not include restructuring activities that the Group is not yet committed to or significant future investments that will enhance the performance of the assets of the CGU being tested. The recoverable amount is sensitive to the discount rate used for the DCF model as well as the expected future cash-inflows and the growth rate used for extrapolation purposes.

Decommissioning liability

Decommissioning liabilities are recognized in respect of the estimated future costs of closure and restoration and for environmental rehabilitation costs in the reporting period when the related environmental disturbance occurs. Decommissioning costs are recorded at the discounted value of expected liability settlement costs calculated using estimated cash flows and recognized as part of the initial cost of the particular asset. Cash flows are discounted at the current rate before tax, which reflects risks inherent to the decommissioning obligations. Unwinding of discount is expensed as incurred and recognised in the consolidated statement of comprehensive income as finance costs. The estimated future costs of decommissioning are reviewed annually and adjusted as appropriate. Changes in the estimated future costs, or in the discount rate applied, are added to or deducted from the cost of the asset.

5. Critical accounting judgements, estimates and assumptions (continued)

Judgements (continued)

Provision for expected credit losses

The Group recognizes provision for expected credit losses for trade and other accounts receivable and funds in credit institutions (cash and cash equivalents, bank deposits).

For trade and other receivable, the Group has applied the standard's simplified approach and has calculated expected credit losses based on lifetime of these financial instruments. The Group used a provision model that is prepared taking into account Group's historical credit loss experience, adjusted for forward-looking factors specific to the debtors and the economic environment. The Group will calibrate the matrix to adjust the historical credit loss experience with forward looking information. For instance, if forecast economic conditions (i.e., gross domestic product) are expected to deteriorate over the next year which can lead to an increased number of defaults in the manufacturing sector, the historical default rates are adjusted. At every reporting date, the historical observed default rates are updated and changes in the forward-looking estimates are analysed.

The assessment of the correlation between historical observed default rates, forecast economic conditions and ECLs is a significant estimate. The amount of ECLs is sensitive to changes in circumstances and of forecast economic conditions. The Group's historical credit loss experience and forecast of economic conditions may also not be representative of customer's actual default in the future. The information about the ECLs on the Group's trade receivables and contract assets is disclosed in Note 10.

For funds in credit institutions (cash and cash equivalent, bank deposits), the Group calculated expected credit losses based on the 12-month period. The 12-month expected credit losses is the portion of lifetime expected credit losses that results from default events on a financial instrument that are possible within 12 months after the reporting date. However, when there has been a significant increase in credit risk since origination, the allowance will be based on the lifetime expected credit losses.

The Group considers that there has been a significant increase in credit risk when contractual payments are more than 30 days past due. Also it is considered a financial asset in default when contractual payment are 90 days past due. However, in certain cases, the Group may also consider a financial asset to be in default when internal or external information indicates that the Group is unlikely to receive the outstanding contractual amounts in full before taking into account any credit enhancements held by the Group.

Thus, as at 31 December 2020 provision for expected credit losses was created in the amount of 9,964 million tenge (as at 31 December 2019: 8,605 million tenge) (Notes 10). Changes in the economy, industry or specific customer conditions would have impact to these allowance recorded in the consolidated financial statements.

Costs to obtain a contract

The Group considers commission to sales agents to be an additional cost to obtain a contract, and capitalizes such costs as an asset on expenses under contracts with customers. The Group depreciates the costs to obtain a contract with customers on a systematic basis, which corresponds to the timing of the provision of services to customers. The Group reviews depreciation periods if the expected service dates have changed.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)
For the year ended 31 December 2020

5. Critical accounting judgements, estimates and assumptions (continued)

Judgements (continued)

Contract liabilities
Deferred revenues are recognized as contract liabilities and recognized over the expected period of the customer relationship. In making its judgments, management considered the detailed criteria for the recognition of revenues from contract with customers set out in IFRS 15, industry practice and the Group's historical churn rate.

Deferred tax assets
Deferred tax assets are recognised for unused tax losses to the extent that it is probable that taxable profit will be available against which the losses can be utilised. Significant management judgement is required to determine the amount of deferred tax assets that can be recognised, based upon the likely timing and the level of future taxable profits, together with future tax planning strategies.

As at 31 December 2020, net deferred tax assets of the Group were equal to 1,937 million tenge (at 31 December 2019: 195 million tenge). Further details are contained in Note 30.

In 2019 the Group reconsidered the tax treatment of deductibility of doubtful debts from individuals, and derecognized deferred tax assets on the allowance on expected credit losses related to the trade receivables from individuals in the amount of 1,378 million tenge (Note 30).

Fair value measurement of financial instruments
When the fair value of financial instruments and financial liabilities recorded in the consolidated statement of financial position cannot be measured based on data in active markets, their fair value is measured using valuation techniques including the discounted cash flow (DCF) model. The inputs to these models are taken from observable markets where possible, but where this is not feasible, a degree of judgement is required in establishing fair values. The judgements include considerations of inputs such as liquidity risk, credit risk and volatility. Changes in assumptions about these factors could affect the fair value reported in the consolidated financial statements. For more details on the fair values refer to Note 33.

6. Segment information
The Group's main operations are concentrated in the Republic of Kazakhstan and are mainly represented by provision of mobile communication services. The Group identifies the segment in accordance with the criteria set in IFRS 8 Operating Segments and based on the way the operations of the Group are regularly reviewed by the chief operating decision maker to analyse performance and allocate resources among business units of the Group.

The Group's Chairman of the Management Board has been determined as the chief operating decision-maker ("CODM"). The CODM reviews the Group's internal reporting in order to assess performance and allocate resources. Segment performance is evaluated based on operating profit or loss and is measured consistently with operating profit or loss in the consolidated financial statements prepared in accordance with IFRS. Management has determined a single operating segment being mobile communication services based on these internal reports.

7. Share capital and earnings per share

Share capital of the Group is as follows:

	31 December 2020		31 December 2019	
	Share	**Number of shares**	Share	Number of shares
Kazakhtelecom JSC	**75.00%**	**150,000,000**	75.00%	150,000,000
Raiffeisenbank JSC	**11.60%**	**23,209,124**	11.82%	23,641,857
Other	**13.40%**	**26,790,876**	13.18%	26,358,143
	100.00%	**200,000,000**	100.00%	200,000,000

The total authorized number of ordinary shares is 200,000,000 shares with a par value of 169 tenge per share, all of which are issued and fully paid.

The calculation of basic and diluted earnings per share is based on the following data:

In millions of tenge	**2020**	2019
Profit for the period attributable to equity shareholders	**17,578**	10,015
Weighted average number of ordinary shares	**200,000,000**	200,000,000
Earnings per share (Kazakhstani tenge), basic and diluted	**87.89**	50.08

The Group has no dilutive or potentially dilutive securities outstanding.

Additional information disclosed in accordance with Kazakhstan Stock Exchange (KASE) requirements

The cost of ordinary shares calculated in accordance with the requirements of the KASE

According to the requirements of the Kazakhstan Stock Exchange ("KASE"), the Group has calculated its cost per ordinary share, which was calculated based on the number of ordinary shares outstanding at the reporting date. The cost per ordinary share as at 31 December 2020 and 2019 is presented below.

In millions of tenge	**31 December 2020**	31 December 2019
Net assets, excluding intangible assets	**42,353**	35,277
Number of ordinary shares in issue	**200,000,000**	200,000,000
Cost of ordinary share, calculated in accordance with listing requirements of KASE (Kazakhstani tenge)	**211.77**	176.39

During year ended 31 December 2020 and 2019, the Group declared and paid dividends in the amount of 9,000 million tenge and 5,972 million tenge, respectively. Dividends per share for the year ended 31 December 2020 were equal to 45 tenge (31 December 2019: 29.86 tenge).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

8. Property and equipment

Movements of property and equipment in 2020 and 2019 were as follows:

In millions of tenge	Land	Buildings and construction	Machinery	Equipment, tools and installations	Assets under construction	Total
Cost						
At 1 January 2019	2,122	19,653	213,725	31,289	20,820	287,609
Additions	–	445	153	3,282	8,229	12,109
Provision for dismantling (Note 22)	–	–	542	–	–	542
Transfer between the groups	–	–	10,683	–	(10,683)	–
Disposals	–	–	–	(113)	–	(113)
At 31 December 2019	2,122	20,098	225,103	34,458	18,366	300,147
Additions	**–**	**265**	**223**	**4,804**	**9,159**	**14,451**
Provision for dismantling (Note 22)	**–**	**–**	**1,899**	**–**	**–**	**1,899**
Transfer between the groups	**–**	**–**	**9,766**	**–**	**(9,766)**	**–**
Disposals	**–**	**–**	**(1,071)**	**(193)**	**(417)**	**(1,681)**
Transfer to Inventory	**–**	**–**	**(23)**	**–**	**(84)**	**(107)**
At 31 December 2020	**2,122**	**20,363**	**235,897**	**39,069**	**17,258**	**314,709**
Accumulated depreciation and impairment						
As at 1 January 2019	–	(6,539)	(167,291)	(25,342)	–	(199,172)
Depreciation charge	–	(370)	(13,536)	(3,054)	–	(16,960)
Disposals	–	–	–	112	–	112
Impairment	–	–	(1,844)	–	–	(1,844)
At 31 December 2019	–	(6,909)	(182,671)	(28,284)	–	(217,864)
Depreciation charge	**–**	**(358)**	**(11,944)**	**(2,926)**	**–**	**(15,228)**
Disposals	**–**	**–**	**1,059**	**188**	**–**	**1,247**
Impairment	**–**	**(165)**	**(79)**	**–**	**(4,511)**	**(4,755)**
At 31 December 2020	**–**	**(7,432)**	**(193,635)**	**(31,022)**	**(4,511)**	**(236,600)**
Net book value						
At 31 December 2019	**2,122**	**13,189**	**42,432**	**6,174**	**18,366**	**82,283**
At 31 December 2020	**2,122**	**12,931**	**42,262**	**8,047**	**12,747**	**78,109**

As at 31 December 2020 and 2019, assets under construction are represented by equipment for installation for base transmission stations, mobile switch servers and other telecommunication equipment and services works.

As at 31 December 2020, the gross carrying value of property and equipment, which has been fully depreciated and still i n use, was 164,522 million tenge (31 December 2019: 150,824 million tenge).

Impairment test

The coronavirus (Covid-19) outbreak has affected many countries and resulted in significant volatility in financial and commodity markets around the world. There is already evidence that the virus has significantly impacted the global economy (Note 33). The Group's management analyzed external and internal sources of information, including the current and future impact of the Covid-19 pandemic on the Group and on macroeconomic environment, and did not observe any significant negative impacts on the Group's business, financial conditions and results of operations. During 2020, the Group did not identify impairment factors for all CGUs related with Covid-19 impact, except certain items of property and equipment as described below.

During 2020 the Group recognized an impairment loss in the amount of 244 million tenge (2019: 1,844 million tenge) for property and equipment and 4,511 million tenge for construction-in-progress (2019: nil), which represented the write-down of certain assets to the recoverable amount as a result of technological obsolescence and damage. Loss was recognized in the consolidated statement of comprehensive income as an operating expense.

9. Intangible Assets

Movements of intangible assets for 2020 and 2019 were as follows:

In millions of tenge	Software and licenses	Intangible assets in progress	Total
Cost			
At 1 January 2019	88,402	1,190	89,592
Additions	8,094	–	8,094
Disposals	(678)	–	(678)
At 31 December 2019	95,818	1,190	97,008
Additions	**12,392**	**–**	**12,392**
Transfers	**718**	**(718)**	**–**
Disposals	**(906)**	**–**	**(906)**
At 31 December 2020	**108,022**	**472**	**108,494**
Accumulated amortization and impairment			
At 1 January 2019	(49,477)	–	(49,477)
Amortisation charge	(9,390)	–	(9,390)
Disposals	679	–	679
At 31 December 2019	(58,188)	–	(58,188)
Amortisation charge	**(11,010)**	**–**	**(11,010)**
Disposals	**906**	**–**	**906**
Impairment	**–**	**(472)**	**(472)**
At 31 December 2020	**(68,292)**	**(472)**	**(68,764)**
Net book value			
At 31 December 2019	37,630	1,190	38,820
At 31 December 2020	**39,730**	**–**	**39,730**

As at 31 December 2020, the carrying amount of the 3G license was 1,667 million tenge (31 December 2019: 2,000 million tenge) and its remaining amortisation period was 5 years. As at 31 December 2020, the carrying amount of the 4G license was 17,478 million tenge (31 December 2019: 19,211 million tenge) and its remaining amortisation period was 10 years.

During 2020, the Group recognized an impairment loss of 472 million tenge, which represented the write-down of billing system. Loss was recognized in the consolidated statement of comprehensive income as an operating expense.

As at 31 December 2020, the gross carrying value of intangible assets, which has been fully depreciated and still in use, was 36,451 million tenge (31 December 2019: 36,192 million tenge).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)
For the year ended 31 December 2020

10. Trade receivables
As at 31 December 2020 and 2019, trade receivables comprised of the following:

In millions of tenge	31 December 2020	31 December 2019
Trade receivable from subscribers	27,412	23,735
Trade receivable from interconnect services	986	407
Trade receivables from roaming operators	170	302
Trade receivables from dealers and distributors	452	39
Trade receivables from related parties (Note 31)	1,188	887
Less: allowance for expected credit losses	(9,964)	(8,605)
	20,244	16,765
Less: long-term portion of trade receivable from subscribers	(2,421)	(1,118)
	17,823	15,647

During the year movements in the allowance for expected credit losses were as follows:

In millions of tenge	2020	2019
Allowance for expected credit losses at the beginning of the year	(8,605)	(6,680)
Charge for the year	(1,547)	(2,256)
Write-offs for the year	188	331
Allowance for expected credit losses at the end of the year	(9,964)	(8,605)

Below is information as of 31 December 2020 and 2019 about the credit risk exposure on the Group's trade receivables using a provision matrix:

		Days past due					
In millions of tenge	Total	Current	1 to 30 days	31 to 60 days	61 to 90 days	91 to 180 days	Over 180 days
31 December 2020							
Estimated total gross book value for default	30,208	17,761	1,574	467	271	543	9,592
Expected credit losses	9,964	17	25	55	62	289	9,516

		Days past due					
In millions of tenge	Total	Current	1 to 30 days	31 to 60 days	61 to 90 days	91 to 180 days	Over 180 days
31 December 2019							
Estimated total gross book value for default	25,370	12,248	1,553	776	362	837	9,594
Expected credit losses	8,605	40	41	64	57	345	8,058

As at 31 December 2020 and 2019 the Group's trade receivables were denominated in the following currencies:

In millions of tenge	31 December 2020	31 December 2019
Tenge	20,074	16,463
US dollars	170	302
	20,244	16,765

11. Inventories

As at 31 December 2020 and 2019, inventories comprised:

In millions of tenge	31 December 2020	31 December 2019
Handsets and accessories (at lower of cost and net realizable value)	**8,523**	6,071
Start packages (at cost)	**255**	159
Marketing materials (at cost)	**150**	61
SIM-cards (at cost)	**77**	71
Other materials (at cost)	**357**	274
	9,362	6,636

During 2020, the Group recognised as an expense 654 million tenge (2019: nil) for inventories carried at net realisable value. This is recognised in general and administrative expenses.

12. Other current non-financial assets

As at 31 December 2020 and 2019, other current non-financial assets comprised of the following:

In millions of tenge	31 December 2020	31 December 2019
Advances paid	**1,548**	2,928
VAT recoverable	**397**	1,891
Prepaid taxes other than income taxes	**710**	1,883
Prepaid expenses	**408**	2
	3,063	6,704

13. Other current financial assets

As at 31 December 2020 and 2019, other current financial assets comprised of the following:

In millions of tenge	31 December 2020	31 December 2019
Other receivables	**94**	914
Due from employees	**151**	336
Other	**–**	121
	245	1,371

As at 31 December 2020 and 2019, other current non-financial assets were fully denominated in tenge.

14. Financial assets at fair value through other comprehensive income

As at 31 December 2020 financial assets at fair value through other comprehensive income, represented by investments in US treasury bills acquired in August 2019, were fully redeemed (31 December 2019: 4,965 million tenge). The Group recognized the financial assets at fair value through other comprehensive income as the contractual cash flows were solely principal and interest and the financial assets were held within a business model for collecting contractual cash flows and selling financial assets. Nominal amount was 12,880,000 USD (equivalent to 5,021 million tenge at the date of acquisition), with maturity till August 2020 and yield to maturity at 2.6%. Fair value of debt instrument was determined by reference to published price quotations in an active market (Level 1). On 18 August 2020 US treasury bills were repaid and the Group received the nominal amount and coupon income in the amount of 12,880,000 USD and 338,100 USD, respectively (equivalent to 5,385 million tenge and 141 million tenge, respectively).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

15. Financial assets at amortized cost

As at 31 December 2020 financial assets at amortized cost in the amount of 18,923 million tenge (31 December 2019: nil) were represented by short-term discount notes of National Bank of the Republic of Kazakhstan ("NBRK") denominated in tenge, which were acquired at purchase price 36,751 million tenge in June-December 2020. During 2020, short-term NBRK discount note was redeemed for a total amount of 18,139 million tenge of nominal value and interest income of 761 million tenge.

The Group recognized the financial assets at amortized cost as the contractual cash flows are solely principal and interest and the financial assets are held within a business model for collecting contractual cash flows.

As at 31 December 2020 financial assets at amortised cost comprised of the following:

In millions of tenge	Maturity date	Yield to maturity	Nominal value	31 December 2020	31 December 2019
NBRK note	13 January 2021	8.92%	10,000	**9,969**	–
NBRK note	15 January 2021	9.41%	4,000	**3,984**	–
NBRK note	22 January 2021	9.85%	3,000	**2,982**	–
NBRK note	22 January 2021	9.85%	2,000	**1,988**	–
			19,000	**18,923**	–

16. Cash and cash equivalents

As at 31 December 2020 and 2019, cash and cash equivalents comprised of the following:

In millions of tenge	31 December 2020	31 December 2019
Cash on current bank accounts	**14,202**	5,549
Bank deposits with original maturity of less than 90 days	**8,782**	3,256
Cash on hand	**39**	20
	23,023	8,825

As of 31 December 2020, short-term bank deposit for the amount of 8,781 million tenge represents overnight deposits in tenge placed in Altyn Bank JSC at interest rate 8.5% and 658 thousand tenge overnight deposits in tenge placed in Citibank Kazakhstan JSC at interest rate 6.5%.

As at 31 December 2020 and 2019, cash and cash equivalents were denominated in various currencies as follows:

In millions of tenge	31 December 2020	31 December 2019
US dollars	**12,982**	3,767
Tenge	**9,398**	4,923
Euro	**642**	111
Russian roubles	**–**	18
Other	**1**	6
	23,023	8,825

17. Borrowings

As at 31 December 2020 and 2019, borrowings comprised of the following:

In millions of tenge	Currency	Effective interest rate	Maturity date	31 December 2020	31 December 2019
Bonds	Tenge	11.84%	16 January 2021	**22,871**	22,828
Eurasian Development Bank JSC	Tenge	13.06%	20 June 2024	**18,129**	28,956
Halyk Bank of Kazakhstan JSC	Tenge	11.20%	21 April 2023	**15,223**	–
Bank of China Kazakhstan JSC	Tenge	10.70%	20 August 2022	**11,059**	5,060
VTB Bank JSC	Tenge	11.90%	15 October 2023	**6,005**	5,088
				73,287	61,932
Less: non-current portion				**(49,933)**	(55,548)
				23,354	6,384

Borrowings are repayable as follows:

In millions of tenge	31 December 2020	31 December 2019
Current portion of borrowings	**23,354**	6,384
Maturity between 1 and 2 years	**10,972**	21,706
Maturity between 2 and 5 years	**38,961**	33,842
Maturity over 5 years	**–**	–
Total non-current portion of borrowings	**49,933**	55,548

The Group's borrowings are denominated in Kazakhstani tenge and represent unsecured loans and bonds. The borrowings have financial and non-financial covenants. Breaches in meeting the covenants would permit the banks to immediately call loans and borrowings. As at 31 December 2020 and 2019, there have been no breaches of the covenants.

As at 31 December 2020 current portion of borrowings includes principal amount and interest accrued of bonds in the amount of 22,649 million tenge and interest accrued of other borrowings in the amount of 705 million tenge.

The Group has not entered into any hedging arrangements in respect of its interest rate exposures.

On 21 February 2019, the Group undertook a bond placement at the Kazakhstan Stock Exchange, in which bonds in the amount of 17,025 million tenge were placed with investors at a yield of 11.5% and on 16 January 2018 a bond placement with the value of 4,950 million tenge.

On 3 February 2020, the Group fully repaid loan obtained from VTB Bank JSC in the amount of 5,133 million tenge, including principal and interest accrued in the amount of 5,000 million tenge and 133 million tenge, respectively. On 15 October 2020 the Group signed credit line agreement with VTB Bank JSC for the amount of 6,000 million tenge at interest rate of 10.7% per annum.

On 16 March 2020, the Group obtained additional loan in the amount of 4,500 million tenge within credit line agreement with Bank of China Kazakhstan JSC with a repayment period of 30 months and a fixed interest rate of 10.5% per annum. On 14 October 2020 the Group has signed addendum to loan agreement with Bank of China to decrease interest rate from 10.5%
to 10.3% per annum under credit line agreement. The change in the interest rate from 10.5% to 10.3% does not represent a substantial modification as in accordance with IFRS 9 and thus, it did not lead to the derecognition of the original liability. The Group recognized finance income in the amount of 33 million tenge as a result of change in the interest rate. The loan is secured by the financial guarantee provided by Kazakhtelecom JSC, the parent company. The Group considers the financial guarantee provided by the parent to be an integral part of the loan, and therefore does not recognize the guarantee received separately in its consolidated financial statements.

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17. Borrowings (continued)

On 23 April 2020, the Group obtained loan in the amount of 15,000 million tenge within credit line agreement with Halyk Bank of Kazakhstan JSC with a maturity of 36 months and a fixed interest rate of 11.5% per annum. On 14 July 2020 interest rates of loan was decreased from 11.5% to 11.2% per annum under credit line agreement. The change in the interest rate from 11.5% to 11.2% does not represent a substantial modification as in accordance with IFRS 9 and thus, it did not lead to the derecognition of the original liability. The Group recognized finance income in the amount of 115 million tenge as a result of change in the interest rate.

On 21 September 2020 and 4 December 2020, the Group repaid principal amount of the loan obtained from Eurasian Development Bank in the amount of 3,630 million tenge and 1,500 million tenge ahead of schedule.

On 28 October 2020 the Group obtained loan in the amount of 6,000 million tenge within the credit line agreement with VTB Bank JSC with maturity till October 2023 at interest rate 11.9% per annum.

On 8 December 2020 the Group has obtained additional loan in the amount of 1,500 million tenge from Bank of China.

18. Right-of-use assets and lease liabilities

The Group's right of use assets are represented by buildings and constructions. Set out below are the carrying amounts of right-of-use assets and lease liabilities recognised and the movements during the period:

In millions of tenge	Total
Cost	
At 1 January 2019	27,816
Modification	535
Additions	801
Cancellation	(19)
At 31 December 2019	29,133
Modification	**161**
Additions	**491**
Cancellation	**(300)**
At 31 December 2020	**29,485**
Accumulated depreciation	
At 1 January 2019	–
Depreciation charge	(4,162)
Cancellation	5
At 31 December 2019	(4,157)
Depreciation charge	**(4,564)**
Cancellation	**40**
At 31 December 2020	**(8,681)**
Net book value	
At 31 December 2019	24,976
At 31 December 2020	**20,804**

18. Right-of-use assets and lease liabilities (continued)

Set out below are the carrying amounts of lease liabilities and the movements during the period:

In millions of tenge	31 December 2020	31 December 2019
At the beginning of the period	**27,053**	28,826
Interest expenses (Note 29)	**3,150**	3,309
Payments	**(6,908)**	(6,394)
Additions	**491**	802
Modifications	**161**	535
Cancellation	**(281)**	(25)
At the end of the period	**23,666**	27,053
Long-term lease liabilities	**19,447**	23,447
Short-term lease liabilities	**4,219**	3,606

The following are the amounts recognised in profit or loss:

In millions of tenge	2020	2019
Depreciation expense of right-of-use assets	**4,564**	4,162
Interest expense on lease liabilities	**3,150**	3,309
Expenses related to short-term leases	**49**	197
Total amount recognised in profit or loss	**7,763**	7,668

The Group had total cash outflows for leases of 6,957 thousand tenge in 2020 (2019: 6,591 million tenge). The Group did not have non-cash additions to right-of-use assets and lease liabilities in 2020 (2019: 2,080 million tenge).

19. Trade payables

As at 31 December 2020 and 2019, trade payables comprised of the following:

In millions of tenge	31 December 2020	31 December 2019
Trade payables to third parties	**21,259**	20,043
Trade payables to related parties (Note 31)	**1,094**	1,132
	22,353	21,175

As at 31 December 2020 and 2019, the Group's trade payables were denominated in the following currencies:

In millions of tenge	31 December 2020	31 December 2019
Tenge	**21,043**	17,293
US dollars	**1,304**	3,813
Other currency	**6**	69
	22,353	21,175

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20. Financial guarantee obligation

On 27 November 2020 the Group issued the financial guarantee on loan agreement of Kazakhtelecom JSC obtained from Eurasian Bank of Development JSC in the amount of 18,266 million tenge. The financial guarantee has maturity till 19 December 2024. The Group initially recognised the financial guarantee at fair value in the amount of 592 million tenge through retained earnings in equity (as at 31 December 2019: nil). At the reporting date, the Group measured financial guarantee obligation at the higher of the amount of the loss allowance determined in accordance with IFRS 9 Financial Instruments and the amount initially recognised less, when appropriate, the cumulative amount of income recognised in accordance with IFRS 15 Revenue from Contracts with Customers. As of 31 December 2020 financial guarantee obligation equaled to 563 million tenge, which represents the initial amount less the cumulative amount of income recognised in accordance with IFRS 15.

21. Contract liabilities

As at 31 December 2020 and 2019, trade contract liabilities comprised of the following:

In millions of tenge	2020	2019
Contract liabilities as at 1 January	**4,149**	3,772
Deferred during the year	**107,352**	106,270
Recognised as revenue during the year	**(109,523)**	(105,893)
Contract liabilities as at 31 December	**1,978**	4,149

22. Asset retirement obligation

Decommissioning liabilities

Provision for decommissioning liabilities is recorded at the discounted value of expected costs to bring the sites and facilities to their original condition using estimated cash flows and is recognised as part of the cost of the specific asset. The cash flows are discounted at a current pre-tax rate that reflects the risks specific to the decommissioning liability.

Movements in provision for decommissioning liabilities for the years ended 31 December 2020 and 2019 were as follows:

In millions of tenge	2020	2019
Provision for decommissioning liabilities as at 1 January	**1,970**	1,285
Additional provisions (Note 8)	**1,899**	542
Unwinding of discount (Note 29)	**138**	143
Provision for decommissioning liabilities as at 31 December	**4,007**	1,970

The provision was determined at the end of the reporting period using the projected inflation rate for the expected period of the fulfilment of obligation, and the discount rate at the end of the year which is presented below:

	2020	2019
Discount rate	**6.83%**	6.98%
Inflation rate	**5.5%**	5.5%
Period of fulfillment of obligation	**11 years**	12 years

23. Provisions

In 2020 the Group accrued certain amount of payable amount related to legal claims on contractual obligation and fines and penalties that Management considers as probable in the amount of 3,685 million tenge and 701 million, respectively.

In millions of tenge	31 December 2020	31 December 2019
Legal claims on contractual obligation	**3,685**	–
Provision of fines and penalties (Note 33)	**701**	–
Other liabilities	**116**	188
	4,502	188

24. Revenue from contracts with customers

In millions of tenge	2020	2019
Voice and other services	**73,852**	78,689
Data service	**58,446**	51,430
Sale of handsets	**34,634**	19,093
Value added services	**7,752**	7,445
	174,684	156,657
Over time	**140,050**	137,564
At a point of time	**34,634**	19,093
	174,684	156,657

25. Cost of sales

In millions of tenge	2020	2019
Cost of SIM-card, scratch card and handsets sales	**28,430**	16,450
Depreciation and amortization	**27,377**	27,037
Interconnect fees and expenses	**19,163**	24,729
Personnel costs	**11,090**	9,392
Transmission services	**9,998**	9,197
Repair and maintenance	**7,065**	7,552
Fees for use of frequency range	**6,310**	5,578
Electricity	**2,939**	3,511
Mobile service tax	**1,960**	1,846
Network sharing agreement	**919**	180
Security and safety	**284**	391
Materials	**284**	281
Rent expenses	**49**	197
Other	**3,265**	2,587
	119,133	108,928

26. Penalty expenses

On 12 April 2019, the Group received from Kar-Tel LLP a notice on termination of the Network Sharing Agreement (hereinafter referred to as the "Agreement"), since there was a change in the Group's controlling shareholder in December 2018, which represents, in accordance with the Agreement, a breach of conditions of the Agreement, giving the right to the second party to terminate the Agreement and request payment of termination fine, determined in accordance with the methodology specified in the Agreement. The Group received from Kar-Tel LLP an invoice for payment of a termination fine in the amount of 14,552 million tenge. The Group repaid the termination fine in full in September 2019.

27. General and administrative expenses

In millions of tenge	2020	2019
Personnel costs	**3,633**	2,885
Depreciation and amortization	**3,425**	3,475
Taxes other than income tax	**898**	1,124
Write-down of inventories to net realizable value	**654**	–
Consulting services	**430**	451
Repair and maintenance	**405**	321
Security and safety	**108**	28
Representative expenses	**104**	102
Business trips	**55**	51
Inventories	**45**	30
Insurance	**26**	24
Trainings	**12**	33
Other	**631**	401
	10,426	8,925

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28. Selling expenses

In millions of tenge	2020	2019
Marketing and advertising	**1,361**	1,849
Amortization of cost to obtain a contract	**253**	338
Commissions for dealers and cash collection	**42**	205
Other	**309**	495
	1,965	2,887

29. Finance costs/finance income

In millions of tenge	2020	2019
Finance costs		
Interest expense on loans	**8,386**	8,358
Interest on lease liabilities (Note 18)	**3,150**	3,309
Unwinding of discount (provision for decommissioning liability) (Note 22)	**138**	143
Other	**79**	85
	11,753	11,895
Finance income		
Interest income on financial assets at amortised cost (Note 15)	**1,072**	–
Interest income on cash balances and deposit	**817**	404
Recognition of discount on long-term loans (Note 32)	**148**	904
Unwinding of issued financial guarantee	**29**	–
Other	**234**	107
	2,300	1,415

30. Income tax expenses

In millions of tenge	2020	2019
Current income tax expense	**(8,611)**	(4,300)
Adjustments in respect of income tax of previous year	**(175)**	76
Deferred income tax benefit	**1,742**	1,497
	(7,044)	(2,727)

The Group are subject to taxation in the Republic of Kazakhstan. Tax rate for the Group and subsidiaries was 20% in 2020 and 2019.

A reconciliation of income tax expenses applicable to profit before taxation at the statutory rate, with the current corporate income tax expenses for the years ended 31 December 2020 and 31 December 2019 is set out below:

In millions of tenge	2020	2019
Profit before taxation	**24,622**	12,742
Income tax at statutory income tax rate of 20%	**4,924**	2,548
Non-taxable income	**(351)**	(1,163)
Non-deductible expenses	**328**	1,020
Legal disputes expenses	**877**	–
Impairment of construction-in-progress	**997**	–
Recognition of tax loss carry forward	**(234)**	(1,378)
Derecognition of deferred tax assets of expected credit losses	**–**	1,150
Adjustments in respect of income tax of previous year	**175**	(76)
Adjustments in respect of deferred income tax of previous year	**328**	626
Total income tax expenses	**7,044**	2,727

Non-taxable income is mainly represented by income from reversal of tax and related fines and penalties provision in the amount of 684 million tenge and interest income on NBRK notes in the amount of 1,072 million tenge. Non deductible expenses mainly represented by representative expenses, taxes at own expenses, and other expenses which are in accordance with Tax Code of the Republic of Kazakhstan are non-deductible.

30. Income tax expenses (continued)

Deferred tax assets and liabilities are presented in the consolidated statement of financial position as follows:

	Consolidated statement of financial position		Consolidated statement of comprehensive income	
In millions of tenge	31 December 2020	31 December 2019	2020	2019
Deferred tax assets				
Expected credit losses	**391**	343	**48**	(993)
Accrued bonuses to employees	**402**	360	**42**	290
Tax loss carry forward	**1,612**	1,378	**234**	1,378
Lease liabilities	**572**	415	**157**	188
Provision for unused vacation	**166**	116	**50**	(2)
Asset retirement obligation	**801**	394	**407**	137
Deferred services	**793**	651	**142**	30
Other	**148**	133	**15**	109
Deferred tax assets	**4,885**	3,790	**1,095**	1,137
Deferred tax liabilities				
Property and equipment and intangible asset	**(2,854)**	(3,390)	**536**	413
Other	**(94)**	(205)	**111**	(79)
Deferred tax liabilities	**(2,948)**	(3,595)	**647**	334
Deferred tax assets/(liabilities), net	**1,937**	195	**1,742**	1,471

The Group performs offsetting of tax assets and liabilities only if a legally enforceable right exists to set off current tax assets against current tax liabilities and deferred tax assets and deferred tax liabilities relating to income tax collected by the same taxation authority.

A deferred tax asset is recognised only to the extent that it is probable that future taxable profits will be available against which the asset can be utilised. In accordance with legislation of the Republic of Kazakhstan, tax losses may be deferred for 10 (ten) years from the date of their origination. Deferred tax assets are reduced to the extent that it is no longer probable that the related tax benefit will be realised.

As at 31 December 2020, the Group has not recognised deferred tax assets in relation to the temporary difference in the amount of 225 million tenge (as at 31 December 2019: 813 million tenge) related to investments in subsidiaries as the Group is able to control the timing of the reversal of those temporary differences and does not expect to reverse them in the foreseeable future.

Deferred tax assets and liabilities are presented in the consolidated statement of financial position as follow:

In millions of tenge	2020	2019
Deferred tax assets	**1,937**	1,378
Deferred tax liabilities	**–**	(1,183)
	1,937	195

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31. Related party disclosures
Parties are generally considered to be related if one party has the ability to control the other party, is under common control, or can exercise significant influence or joint control over the other party in making financial and operational decisions. In considering each possible related party relationship, attention is directed to the substance of the relationship, not merely the legal form.

The Group's primary transactions with related parties are consulting services, technical assistance and operational support, transmission rent, roaming and interconnect.

As at 31 December 2020, the Group recognized an allowance for expected credit losses in the amount of 56 million tenge in respect of receivables from related parties (31 December 2019: 98 million tenge).

Related party transactions were made on terms agreed between parties that may not necessarily be at market rate. Sales and purchases with related parties during 2020 and 2019, and the balances with related parties as at 31 December 2020 and 2019, were as follows:

In millions of tenge	**2020**	2019
Sales of goods and services		
Entities of Samruk Kazyna group	**210**	197
Entities of Kazakhtelecom group	**12,351**	11,674
Government entities	**1,244**	303
Purchases of goods and services		
Entities of Samruk Kazyna group	**445**	745
Entities of Kazakhtelecom group	**19,723**	18,988
Government entities	**77**	26

In millions of tenge	**31 December 2020**	31 December 2019
Trade receivables (Note 10)		
Entities of Samruk Kazyna group	**43**	65
Entities of Kazakhtelecom group	**1,100**	816
Government entities	**45**	6
Trade payables (Note 19)		
Entities of Samruk Kazyna group	**62**	156
Entities of Kazakhtelecom group	**1,018**	975
Government entities	**14**	1

Compensation to key management personnel
For the years ended 31 December 2020 and 2019, the total compensation to key management personnel included in the accompanying consolidated statement of comprehensive income under general and administrative expenses was 249 million tenge and 118 million tenge, respectively. Compensation to key management personnel consists of wages fixed in the employment agreement, as well as remuneration based on the performance for the year.

32. Financial instruments and financial risk management objectives and principles

The Group's principal financial instruments include loans, bonds, lease liabilities, cash and cash equivalents, bank deposits and accounts receivable and accounts payable. The main risks associated with the Group's financial instruments include, currency and credit risk. In addition, the Group monitors market risk and liquidity risk associated with all financial instruments.

Impairment losses on financial assets

Impairment losses on financial assets for the year ended 31 December 2020 and 2019, comprise accruing reserve on expected credit losses for trade receivables in amount 1,547 million tenge and 2,256 million tenge, respectively (Note 10).

Interest rate risk

Interest rate risk is the risk that the value of a financial instrument will fluctuate due to changes in market interest rates. As at 31 December 2020 and 2019, the Group had no loans or borrowings with floating interest rates and was not subjected to the risk of changes in market interest rates.

Foreign currency risk

Currency risk is the risk that the value of a financial instrument will fluctuate due to changes in foreign exchange rates.

The majority of the Group's purchases of property, plant and equipment and inventories, as well as certain services such as roaming are denominated in US dollars, the Group's consolidated statement of financial position can be affected significantly by movement in the US dollar / tenge exchange rates.

The following table demonstrates the sensitivity to a reasonably possible change in the exchange rates of US dollar to tenge, with all the variables held constant, of the Group's profit before income tax (due to changes in the fair value of monetary assets and liabilities). There is no impact on the Group's equity.

	2020		2019	
In millions of tenge	Increase/ (decrease) in exchange rate	Effect on profit before tax	Increase/ (decrease) in exchange rate	Effect on profit before tax
US dollars	14%	1,659	12%	626
	-11%	(1,303)	-9%	(470)

Credit risk

Credit risk is the risk that the Group will incur finance costs because its customers, clients or counterparties failed to discharge their contractual obligations. The Group is exposed to credit risk associated with its operating activities (primarily with respect to trade receivables) and financial activities, including bank deposits and financial organizations, foreign exchange transactions and other financial instruments.

Trade receivables

Financial instruments in which the Group's credit risk is concentrated are primarily trade receivables. The credit risk associated with these assets is limited due to the large number of the Group's customers and the continuous monitoring procedures for customers and other debtors.

An impairment analysis is performed at each reporting date using a provision matrix to measure expected credit losses. The provision rates are based on days past due for groupings of various customer segments with similar loss patterns (i.e., by geographical region, product type, customer type and rating, and coverage by letters of credit or other forms of credit insurance). The calculation reflects the probability-weighted outcome, the time value of money and reasonable and supportable information that is available at the reporting date about past events, current conditions and forecasts of future economic conditions. Generally, trade receivables are written-off if past due for more than three years and are not subject to enforcement activity. The maximum exposure to credit risk at the reporting date is the carrying value of each class of financial assets disclosed in Note 10.

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32. Financial instruments and financial risk management objectives and principles (continued)

Financial instruments and cash deposits

In accordance with the financial policy, the Group places free cash in several of the largest Kazakhstani banks (with the highest credit ratings). To manage the credit risk associated with the placement of free cash in banks, the Group's management periodically conducts procedures for assessing the solvency of banks. To facilitate such an assessment, deposits are primarily placed in banks, where the Group already has comparable credit obligations, a current checking account and can easily monitor the activities of such banks.

			Cash balance		Balance on deposit accounts	
In millions of tenge	**Rating 2020**	Rating 2019	**2020**	2019	**2020**	2019
Citibank Kazakhstan JSC	**BBB+**	A+	**2,886**	3,120	**1**	139
Altyn Bank JSC	**BBB-**	BBB-	**1,301**	35	**8,781**	3,117
Credit Suisse (Schweiz) AG	**A+**	A+	**1,057**	466	**–**	–
Halyk Bank Kazakhstan JSC	**BB**	BB	**8,861**	1,316	**–**	–
Kaspi Bank JSC	**BB-**	BB-	**88**	514	**–**	–
SB Sberbank JSC	**BB+**	B	**8**	96	**–**	–
Halyk Finance JSC	**BB**	BB	**–**	1	**–**	–
Bank of China Kazakhstan JSC	**BBB+**	A+	**1**	1	**–**	–
Total			**14,202**	5,549	**8,782**	3,256

Liquidity risk

Liquidity risk is the risk that the Group will be unable to meet its payment obligations when they fall due under normal and stress circumstances.

The Group monitors its risk of a shortage of funds using a liquidity planning tool. This tool considers the maturity of both its financial investments and financial assets (e.g. accounts receivables, other financial assets) and projected cash flows from operations.

The table below summarises the maturity profile of the Group's financial liabilities based on contractual undiscounted payments.

In millions of tenge	On demand	1 to 3 months	3 months to 1 year	From 1 to 5 years	More than 5 years	Total
At 31 December 2020						
Borrowings	**–**	**24,398**	**4,258**	**56,244**	**–**	**84,900**
Financial guarantees*	**–**	**852**	**3,593**	**14,586**	**–**	**19,031**
Trade payables	**–**	**22,353**	**–**	**–**	**–**	**22,353**
Lease liabilities	**–**	**1,592**	**4,780**	**19,706**	**3,597**	**29,675**
Due to employees	**–**	**3,691**	**–**	**–**	**–**	**3,691**
	–	**52,886**	**12,631**	**90,536**	**3,597**	**159,650**
At 31 December 2019						
Borrowings	–	7,384	4,253	70,368	–	82,005
Trade payables	–	21,175	–	–	–	21,175
Lease liabilities	–	1,456	4,372	22,920	4,619	33,367
Due to employees	–	3,172	–	–	–	3,172
	–	33,187	8,625	93,288	4,619	139,719

* Based on the maximum amount that can be called for under the financial guarantee's contract (Note 20).

32. Financial instruments and financial risk management objectives and principles (continued)

Cash flow risk

Cash flow risk is the risk that future cash flows associated with a monetary financial instrument will fluctuate in amount.

Cash flows requirements are monitored on a regular basis and management provides for availability of sufficient funds required to fulfil any liabilities when they arise. The management of the Group believes that any possible fluctuations of future cash flows associated with a monetary financial instrument will not have material impact on the Group's operations.

Capital management

The primary objective of the Group's capital management is to ensure that it maintains a strong credit rating and healthy capital ratios in order to support its business and maximise shareholder value.

The Group manages its capital structure and makes adjustments to it, in light of changes in economic conditions. To maintain or adjust the capital structure, the Group may adjust the dividend payment to the holders of common shares, return equity to shareholders or issue new shares. No changes were made by the Group in the capital management objectives, policies or processes in 2020 and 2019.

Fair values

The fair value of non-current financial assets is estimated using discounted cash flow based on deposit rates currently available to the Group with similar terms and average maturities. The fair value of non-current financial assets is estimated using discounted cash flow based on credit rates currently available to the Group with similar terms and average maturities.

The table below presents fair value hierarchy of assets and liabilities of the Group. Disclosure of quantitative information of fair value hierarchy of financial instruments as at 31 December 2020 was as follow:

In millions of tenge	Date of valuation	Price	Price quotation on active market (Level 1)	Significant observable in-puts (Level 2)	Total
Assets for which fair values are disclosed					
Financial assets at amortized cost	31 December 2020	18,624	–	–	18,624
Short-term trade receivables	31 December 2020	–	–	17,823	17,823
Long-term trade receivables	31 December 2020	–	–	2,504	2,504
Other current financial assets	31 December 2020	–	–	245	245
Liabilities for which fair values are disclosed					
Borrowings	31 December 2020	–	–	72,692	72,692
Trade payables	31 December 2020	–	–	22,353	22,353
Due to employees	31 December 2020	–	–	3,691	3,691

The table below presents fair value hierarchy of assets and liabilities of the Group. Disclosure of quantitative information of fair value hierarchy of financial instruments as at 31 December 2019 was as follow:

In millions of tenge	Date of valuation	Price	Price quotation on active market (Level 1)	Significant observable in-puts (Level 2)	Total
Assets measured at fair value					
Financial assets at fair value through other comprehensive income	31 December 2019	4,965	–	–	4,965
Assets for which fair values are disclosed					
Short-term trade receivables	31 December 2019	–	–	15,647	15,647
Long-term trade receivables	31 December 2019	–	–	1,147	1,147
Other current financial assets	31 December 2019	–	–	1,371	1,371
Liabilities for which fair values are disclosed					
Borrowings	31 December 2019	–	–	61,778	61,778
Trade payables	31 December 2019	–	–	21,175	21,175
Due to employees	31 December 2019			3,172	3,172

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32. Financial instruments and financial risk management objectives and principles (continued)

Fair values (continued)

As at 31 December 2020 and 2019, the carrying amounts of the Group's financial assets and liabilities presented as follows:

In millions of tenge	Carrying amount 31 December 2020	Fair value 31 December 2020	Unrecog-nised gain/(loss)	Carrying amount 31 December 2019	Fair value 31 December 2029	Unrecog-nised gain/(loss)
Financial assets						
Cash and cash equivalents	**23,023**	**23,023**	**–**	8,825	8,825	–
Financial assets at fair value through other comprehensive income	**–**	**–**	**–**	4,965	4,965	–
Financial assets at amortized cost	**18,923**	**18,624**	**(299)**			
Short-term trade receivables	**17,823**	**17,823**	**–**	15,647	15,647	–
Long-term trade receivables	**2,421**	**2,504**	**83**	1,118	1,147	28
Other current financial assets	**245**	**245**	**–**	1,371	1,371	–
Financial liabilities						
Borrowings	**73,287**	**72,692**	**595**	61,932	61,778	(154)
Trade payables	**22,353**	**22,353**	**–**	21,175	21,175	–
Due to employees	**3,691**	**3,691**	**–**	3,172	3,172	–
Total unrecognised change in unrealised fair value	**161,766**	**160,955**	**379**	118,205	118,080	(126)

Valuation techniques and assumptions

The following describes the methodologies and assumptions used to determine fair values for those financial instruments which are not already recorded at fair value in the financial statements.

Assets for which fair value approximates carrying value

For financial assets and financial liabilities that are liquid or having a short term maturity (less than three months) it is assumed that their fair value approximates to the carrying amount. This assumption is also applied to demand deposits and savings accounts without a specific maturity.

Financial liabilities carried at amortised cost

The fair value of loans obtained is measured by discounting future cash flows using rates currently existing for outstanding amounts with similar terms, credit risk and maturity.

32. Financial instruments and financial risk management objectives and principles (continued)

Changes in liabilities arising from financial activities

Changes in liabilities arising from financial activities for 2020 were as follows:

In millions of tenge	1 January 2020	Loan obtained	New leases	Principal repaid	Interest accrued	Interest paid	Reclassification	Modifications	Cancellation of leases	Commission recognized	Discount recognized	31 December 2020
Borrowings: non-current portion	**55,548**	**27,000**	**–**	**(11,130)**	**–**	**–**	**(21,337)**	**–**	**–**	**–**	**(148)**	**49,933**
Borrowings: current portion	**6,384**	**–**	**–**	**(5,000)**	**8,386**	**(7,753)**	**21,337**	**–**	**–**	**–**	**–**	**23,354**
Long-term lease liabilities	**23,447**	**–**	**491**	**–**	**–**	**–**	**(4,371)**	**161**	**(281)**	**–**	**–**	**19,447**
Short-term lease liabilities	**3,606**	**–**	**–**	**(3,758)**	**3,150**	**(3,150)**	**4,371**	**–**	**–**	**–**	**–**	**4,219**
Total	**88,985**	**27,000**	**491**	**(19,888)**	**11,536**	**(10,903)**	**–**	**161**	**(281)**	**–**	**(148)**	**96,953**

Changes in liabilities due to financial activities for 2019 were as follows:

In millions of tenge	1 January 2019*	Loan obtained	New leases	Principal repaid	Interest accrued	Interest paid	Reclassification	Modifications	Cancellation of leases	Commission recognized	Discount recognized	31 December 2019*
Borrowings: non-current portion	14,936	32,025	–	–	8,358	(6,911)	8,399	–	–	(355)	(904)	55,548
Borrowings: current portion	51,783	5,000	–	(42,000)	–	–	(8,399)	–	–	–	–	6,384
Long-term lease liabilities	25,184	–	802	–	–	–	(3,049)	534	(24)	–	–	23,447
Short-term lease liabilities	3,642	–	–	(3,085)	3,309	(3,309)	3,049	–	–	–	–	3,606
Total	95,545	37,025	802	(45,085)	11,667	(10,220)	–	534	(24)	(355)	(904)	88,985

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

33. Commitments and contingent liabilities

Operating environment

Kazakhstan continues economic reforms and development of its legal, tax and regulatory frameworks as required by a market economy. The future stability of the Kazakhstan economy will largely depend on these reforms, as well as on the effectiveness of the Government's actions in the area of economy, financial and monetary policy.

Coronavirus pandemic and market conditions

Starting from March 2020, there has been significant volatility in the stock, currency and commodity markets, including a drop-in oil prices and a devaluation of tenge against the US dollar and the euro. Moreover, in connection with the recent rapid development of the coronavirus pandemic (COVID-19), on 16 March 2020 Kazakhstan introduced state emergency measures during the period through 16 April 2020, and subsequently extended until 15 May 2020, including quarantine in major cities, which had a significant impact on the level and scale of business activity. Later the Government of Kazakhstan introduced new quarantine period from 5 July 2020 till 2 August 2020.

As the date of issuance of the consolidated financial statements, Kazakhstan has not introduced strict quarantine measures to confront the possible second wave of coronavirus pandemic. However, if measures such as smart distancing do not succeed in keeping the rate of new infections to a minimum and restrictions cannot be eased further to restore a sense of safety to businesses and households, then a sustained period of weakness is to be expected. The Group keeps analysing and monitoring the situation.

The coronavirus pandemic has developed into a global economic crisis. Due to higher demand for certain telecommunications services the impact of the crisis was felt less severely by the telecommunications industry than by other industries.

The Group experienced a direct impact on roaming revenues from lower international travel and expected economic pressures to impact the Group's customer revenues over time. However, the Group sustained significant increases in data volumes. Despite trade restrictions revenue from sales of handsets and equipment was not highly affected.

The management assessed that even there is currently a deal of uncertainty regarding the pandemic, the results of operations and financial position of the Group would not be significantly affected.

Further possible future effects on the measurement of individual assets and liabilities are continued to be analysed. The Group has put in place cost saving measures to mitigate potential effects on earnings.

Recognition of expected credit losses (ECL) on the Group's financial assets that are not measured at fair value considered estimated impacts of the COVID-19 pandemic. For financial assets whose counterparties have ratings published by credit risk agencies, when already reflecting the effects of the pandemic, the information was used to calculate the ECL. For other financial assets, in general, the expected effects of COVID-19 pandemic were incorporated into the ECL by identifying the changes in default probability based on observable data. No significant effects were identified.

The Group believes that there were no impairment indicators of its long-term non-financial assets as at 31 December 2020. As uncertainties in market trend and economic conditions may remain persistent considering duration of the spread of COVID-19 and countermeasures taken by country, actual results in any future periods could be differ materially from the estimates. The Group will continue to monitor the situation closely.

Capital commitments

The Group generally enters into contracts for the completion of construction projects and purchase of equipment. As at 31 December 2020, the Group had contractual commitments totaling 4,375 million tenge, excluding VAT (as at 31 December 2019: 5,213 million tenge, excluding VAT).

Taxation

Tax legislation and regulatory framework of the Republic of Kazakhstan are subject to constant changes and allow for different interpretations. Instances of inconsistent opinions between local, regional and national tax authorities are not unusual. The current regime of penalties and interest related to reported and discovered violations of Kazakhstan's tax laws are severe. Penalties are generally 80% of the taxes additionally assessed and interest is assessed at the refinancing rate established by the National Bank of the Republic of Kazakhstan multiplied by 1.25. As a result, penalties and interest can amount to multiples of any assessed taxes. Fiscal periods remain open to review by the authorities in respect of taxes for five calendar years preceding the year of review.

33. Commitments and contingent liabilities (continued)

Taxation (continued)

Tax audit for 2012 – 3rd quarter 2015

In July 2017, the Kazakhstan tax authority completed its comprehensive tax audit for the period of 2012 – 3rd quarter 2015. Based on the results of the tax audit, the tax authority made an accrual of additional taxes and fines and penalties in the total amount of 9,008 million tenge, of which 5,790 million tenge is for unpaid taxes and 3,218 million tenge represents fines and penalties. The Group did not agree with some results of tax audit and filed an appeal.

In January 2018, Kcell disputed the results of the tax authority in the First Instance Court and the Group's appeal was dismissed. In June 2018, the Court of Appeal reviewed the appeal claim and left the unfavorable ruling of the First Instance Court in force. Although the decision was binding, the Group reserved the right to further appeal it in the Supreme Court. On 5 November 2018, the Group filed a petition to the cassation instance of the Supreme Court of the Republic of Kazakhstan. On 5 December 2018, the petition was dismissed by the Supreme Court of the Republic of Kazakhstan.

In February 2019, the Group appealed to the Supreme Court of the Republic of Kazakhstan. Based on resolution of the Supreme Court of the Republic of Kazakhstan dated 23 July 2019, the appeal of the Group was partially satisfied. Precisely, First Instance Court's act in the part of concerning following cases was cancelled:

- Additional charge on withholding tax for services provided by non-resident legal entities in the amount of 2,197 million tenge;
- Additional VAT on software technical support services provided by non-resident legal entities in the amount of 780 million tenge;
- Related fines and penalties in the amount of 2,839 million tenge.

For the year ended 31 December 2019, the Group recognised income from reversal of tax and related penalties provision in the amount of 5,816 million tenge.

For the year ended 31 December 2020, the Group recognised income from reversal of the tax and related fines and penalties provision in the amount of 216 million tenge recognized due to expiration of the limitation period for tax liabilities.

Tax risks assessment

In the beginning of 2020, the Group performed recalculation of the tax risk provisions for VAT and PIT recognized by the Group in previous years. As a result, for the year ended 31 December 2020, the Group recognized income from reversal of provision on VAT and personal income tax in the amount of 257 million tenge and 211 million tenge, respectively.

New technical regulations

Order No. 91 of the Committee of the National Security dated 20 December 2016 on approval of the Technical Regulations General Requirements to the Telecommunication Equipment in Ensuring Conducting of Operative Search Measures, Collection and Storage of Subscribers' Information was published on 7 February 2017 and came into force on 8 February 2018. According to the new regulations, there are additional requirements to the telecommunication equipment that include expansion of technical capabilities of equipment to conduct operative search activities, collection and storage of subscribers' information (hereinafter – "ORA"). Currently, the Group is in the process of modernization of the telecommunication equipment of the Kcell's network in order to comply with the requirements of the Technical Regulations.

Cases related to the abuse of dominant position

Tariffication of Kcell's mobile internet services

On 19 October 2018, the Committee on Regulation of Natural Monopolies, Protection of Competition and Consumer Rights of the Ministry of National Economy of the Republic of Kazakhstan ("Committee") initiated administrative proceedings against the Group for an alleged administrative violation related to the abuse of its dominant position in 2017. The potential fine, which can be imposed by the court, constitutes approximately 2,000 million tenge.

According to the Committee, the violation resulted in the establishment of different prices for Kcell's mobile Internet access service, when the data allowance was exceeded or the monthly subscription fee was not paid in a timely manner. In addition, the Committee issued an order for the Group to return to Kcell brand subscribers all fees charged in 2017 when the monthly data allowance was exceeded and when the monthly subscription fee for mobile Internet access services had not been paid.

The Group did not agree with the order issued by the Committee. On 3 July 2019, the Group appealed to the Court.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

For the year ended 31 December 2020

33. Commitments and contingent liabilities (continued)

Cases related to the abuse of dominant position (continued)

On 25 October 2019, Specialised Inter-district Economic Court of Almaty issued the resolution to cancel administrative proceedings due to the lack of an offense. However, the Committee had the right to appeal within 180 days after announcement of the resolution. On 14 April 2020, the Committee appealed the decision of Specialised Inter-district Economic Court of Almaty. On 4 May 2020 the administrative proceedings were finalized after the decision of the Supreme Court of RK to reject the Committee's appeal due to lack of offence. The decision of Supreme Court of RK (as the superior level of authority) is final decision, that essentially not subject to revision.

Billing cycle of mobile phone plans

On 27 December 2019, the Company received a notification from the Committee on Regulation and Protection of Competition of the Ministry of National Economy of the Republic of Kazakhstan ("Committee") prescribing that the Group should bring its existing and legacy mobile phone plans in line with Rules for provision of mobile services ("Rules"), namely to set a calendar month as default billing cycle, as follows from the definition of the term "accounting period". According to the Committee, by establishing a one-day, a weekly, a 28-day or a 30-day billing cycle on mobile phone plans the Group breaches article 174.1 of the Business Code of the Republic of Kazakhstan. The Committee also sees the reduction of billing cycle as possible abuse of the dominant position through violation of the rights of consumers. On 15 July 2020 the Company received a copy of the Committee's Order on conducting an investigation. In the course of the investigation, the Company has provided the relevant data and information requested by the Committee. On 7 September 2020 the Company received Investigation Report stating that there were no violations of the legislation in the actions of the mobile operator. The investigation in relation to the Company's activity was terminated.

Kcell Solution tax legal case

In 2018, tax authorities initiated tax audit in respect to Kcell Solutions LLP (Kcell Solutions) with regard to CIT and VAT. According to the result of audit tax, generated tax losses carried forward and recognized VAT input by Kcell Solutions in 2013-2017 have been reduced by the total amount of 427 million tenge and 165 million tenge respectively.

Kcell Solutions disputed the results of the tax authority in Judicial Board for Civil Cases of Almaty City Court. On 29 January 2020, Judicial Board for Civil Cases of Almaty City Court dismissed the appeal of Kcell Solutions. Kcell Solutions did not agree with results and filed an appeal to the Supreme Court of the Republic of Kazakhstan. Based on resolution of the Supreme Court of the Republic of Kazakhstan dated 25 August 2020, the Kcell Solutions's appeal was fully satisfied, thus previously reduced tax losses carried forward and VAT input in the amount of 427 million tenge and 165 million tenge, respectively, were fully recovered. Accordingly, the Group recognised deferred tax assets on the tax losses carried forward and other income on recovered VAT input in the amount of 427 million tenge and 108 milion tenge, respectively.

Customs inspection

On 13 September 2019, the Customs Control Department ("CCD") of Almaty issued an order on initiation of custom audit i n relation to the Group's operation for the period 2014-2019. CCD examines the Group's tax reporting documents for the purpose of the revealing of violations on incorrect determination of the customs value of goods and its incorrect classification. On 9 October 2019, CCD suspended the custom audit to allow the Group to prepare required documents. On 9 September 2020, the Group provided the entire package of documents requested by the CCD, which are currently being examined by the auditors of CCD. The ongoing custom audit is related to the revealing of violations of customs regulations, incorrect determination of the customs value of goods, and if violations are identified, the Group may be brought to administrative penalty and be liable to pay appropriate customs charges, including import VAT and late payment fees. On 15 October 2020 the Customs Control Department issued the notice to postpone the customs inspection of the Group for an indefinite period. The Group estimated probability of the outflow of resources embodying economic benefits as probable and accrued provision on additional charge, fines and penalties in the amount of 701 million tenge (Note 23).

34. Subsequent events

On 6 January 2021 the Group obtained loan from Alfa Bank in the amount of 12,000 million tenge with interest rate of 10.7% per annum with maturity till 5 January 2024.

On 8 January 2021 the Group partially repaid loan obtained from Eurasian Development Bank in the amount of 12,000 million tenge ahead of the schedule.

On 27 January 2021 the Group additionally acquired notes of the National Bank of Republic of Kazakhstan in the amount of 2,980 million tenge.

APPENDIX TO SUSTAINABILITY REPORT

Personnel management

Employment

1. Total headcount of the organization as of 31.12.2020, with a breakdown

- By age groups:

Employees	> 30 years	30-50 years	< 50 years	Grand Total
Permanent	885	1291	73	2249
Temporary	160	65		225
Total	**1045**	**1356**	**73**	**2474**

- By gender and geographic region, including percent of employees hired in the reporting year (2020).

As of 01.01.2020	Women	Men	Total
Permanent	**1017**	**933**	**1950**
Aktau	21	14	35
Aktobe	23	18	41
Almaty	514	511	1025
Atyrau	35	21	56
Ekibastuz		2	2
Karaganda	30	22	52
Kazaly	1		1
Kokshetau	11	11	22
Kostanay	11	12	23
Kyzylorda	11	11	22
Nur-Sultan	99	92	191
Pavlodar	16	18	34
Petropavlovsk	9	14	23
Saryagash		6	6
Semey	12	12	24

Hired in 2020	Women	Men	Total
Permanent	**149**	**281**	**299**
Aktau	3	7	10
Aktobe	1	7	8
Almaty	95	128	223
Atyrau	8	11	19
Ekibastuz	1		1
Karaganda	4	14	18
Kazaly	1		1
Kokshetau		7	7
Kostanay		5	5
Kyzylorda		4	4
Nur-Sultan	12	25	37
Pavlodar		7	7
Petropavlovsk		6	6
Saryagash	1	1	2
Semey		4	4

As of 31.12.2020	Women	Men	Total
Permanent	**1166**	**1083**	**2249**
Aktau	17	16	33
Aktobe	23	22	45
Almaty	630	593	1223
Atyrau	35	23	58
Ekibastuz	27	28	55
Kazaly	2		2
Kokshetau	11	13	24
Kostanay	11	13	24
Kyzylorda	10	13	23
Nur-Sultan	101	107	208
Pavlodar	13	25	38
Petropavlovsk	8	15	23
Rudnyi	1	1	2
Saryagash		7	7
Semey	12	12	24

Shymkent	180	116	296
Taldykorgan	9	6	15
Taraz	12	14	26
Turkestan	3	4	7
Uralsk	13	15	28
Ust-Kamenogorsk	7	13	20
Zhetysay		1	1
Temporary	**154**	**93**	**247**
Aktau	2	2	4
Aktobe	10	3	13
Almaty	70	27	97
Atyrau	7	1	8
Karaganda	4		4
Kokshetau	1	1	2
Kostanay	2	2	4
Kyzyl-Orda	1		1
Nur-Sultan	12	13	25
Pavlodar	2	1	3
Petropavlovsk		2	2
Semey	3	2	5
Shymkent	25	30	55
Taldykorgan	5	1	6
Taraz	2	1	3
Turkestan	3	1	4
Uralsk	1	4	5
Ust-Kamenogorsk	4	2	6
Foreigners		**1**	**1**
Almaty		1	1
Total	**1243**	**1027**	**2270**

Shymkent	20	23	43
Taldykorgan		6	6
Taraz		6	6
Temirtau	1	1	2
Turkestan		3	3
Uralsk		5	5
Ust-Kamenogorsk		5	5
Zhanaozen	1	3	4
Temporary	**177**	**238**	**415**
Aktau	3	8	11
Aktobe		4	4
Almaty	65	108	173
Atyrau	11	6	17
Karaganda	8	8	16
Kokshetau	4	4	8
Kostanay		3	3
Kyzyl-Orda	1	6	7
Nur-Sultan	17	16	33
Pavlodar		6	6
Petropavlovsk		3	3
Semey	2	3	5
Shymkent	55	41	96
Taldykorgan	4	5	9
Taraz	3	3	6
Turkestan	1	1	2
Uralsk	2	7	9
Ust-Kamenogorsk	1	6	7
Total	**321**	**519**	**840**

Shymkent	195	131	326
Taldykorgan	11	7	18
Taraz	12	15	27
Temirtau	1	1	2
Turkestan	4	5	9
Uralsk	11	18	29
Ust-Kamenogorsk	7	15	22
Zhanaozen	4	2	6
Zhetysay		1	1
Temporary	**141**	**104**	**245**
Aktau	3	2	5
Aktobe	5	4	9
Almaty	55	29	84
Atyrau	8	2	10
Karaganda	6	5	11
Kokshetau	4	2	6
Kostanay	2	4	6
Kyzyl-Orda	3	2	5
Nur-Sultan	15	6	21
Pavlodar	1	3	4
Petropavlovsk		4	4
Semey	3	2	5
Shymkent	28	26	54
Taldykorgan	2	3	5
Taraz	2	2	4
Turkestan	1	2	3
Uralsk	2	4	6
Ust-Kamenogorsk	1	2	3
Total	**1287**	**1187**	**2474**

- Personnel turnover – turnover rate, voluntary and involuntary, by main employee categories

Main employee categories	Turnover rate in 2020	
	Voluntary	Involuntary
Managers	12%	2%
Specialists	16%	3%
Office workers	0%	18%
Workers	18%	5%

Fringe benefits

Benefit		Conditions
Financial assistance	Covid 19	
	Death in the family	After probation period
	Death of an employee	After probation period
	Disabled employee	After probation period
	Employees with disabled child(ren)	After probation period
Sick leave	14 calendar days per year are compensated at 80% of the employee’s regular wage	
Employee transportation	Transportation for night shift employees - 23:00 till 06:00	
	Transportation for employees who work outside the city limits	
Health insurance/Fitness	Two options: health insurance or compensation of gym expenses in the amount of no more than 77000 tenge per year	After probation period

Mobile communication	Corporate cell phone tariff or compensation of mobile expenses, depending on the position held and involvement in projects	
Fuel	Fuel cards for the employees engaged in itinerant work who use their private vehicles for business purposes	
Taxi	Taxi allowance for the employees engaged in itinerant work who do not have their own vehicles	

Salary review in the company depends on its performance and corporate KPIs and is approved by the Management Board and the Board of Directors. Employee incentives: Kcell Business (monthly/quarterly functional motivation programs). Annual bonus - for employees not participating in Kcell Business. It is calculated based on the performance and approved KPI cards at the end of the year.

2. Total number of employees who took leave and returned from maternity/paternity leave in the reporting year (2020), with a breakdown by gender

Row Labels	F	M	Grand Total
Staff Permanent	572	14	586
Staff Temporary	21		21
Grand Total	**593**	**14**	**607**

3. Information on the minimum notice period required to inform an employee of significant changes affecting their work.
   The minimum notice period varies depending on the law:
   - Notice of employment termination is given to the employee and competent authority 1 month in advance;
   - Notice of employment contract expiration is given on the last working day;
   - Notice of an unsuccessful probation period may be given any time during the probation period (three months from hire date);
   - Notice of change of employment conditions is given 15 calendar days in advance.

<u>Occupational health and safety</u>

1. No accidents were registered in the Company in 2020.
2. Work accidents are registered and investigated in accordance with Chapter 20 of the Labor Code of the Republic of Kazakhstan, as well as internal policies and procedures of the Company: a) Accident Investigation Regulation, b) Accident Reporting Regulation.

3. Work at height; work a high risk of morbidity - no.
4. Agreements with trade unions - no.
5. In six-month' period 6 fires occurred - 4 fires caused by a short circuit; 2 fires caused by the lessors.
6. 62 rooms are equipped with an automatic gas extinguishing system;
7. 2 objects have a water extinguishing, smoke removal and air pressure systems
8. 37 objects are equipped with automatic fire alarms
9. 15 mobile base stations are equipped with gas extinguishing systems.
10. All premises and buildings are provided with primary fire extinguishing means

Training and education

The average number of training hours per employee during the reporting year, broken down by gender and employee categories, is presented below:

1,769 hours for 885 employees of the Sales and Customer Service Departments; 242 employees received external training ~ 1,936 hours. Total: 3,705 hours per 1,127 employees = 3.2 hours

The Company has its own advanced training programs in place for the front-line employees. The company also buys training programs from external suppliers for the employees working in our stores and contact center.

Efficiency of employee training before they start to work - **325** people passed the exam.

Diversity and Equity

1. Percent of the total number of employees by various categories, such as: gender; age groups: up to 30 years, 30-50 years, over 50 years; other diversity indicators

Employees	Women	Men	Total	Women	Men	Total
Permanent	**1166**	**1083**	**2249**	**51%**	**49%**	**100%**
Aktau	17	16	33	52%	48%	100%
Aktobe	23	22	45	51%	49%	100%
Almaty	630	593	1223	52%	48%	100%
Atyrau	35	23	58	60%	40%	100%
Karaganda	27	28	55	49%	51%	100%
Kazaly	2		2	100%	0%	100%
Kokshetau	11	13	24	46%	54%	100%
Kostanay	11	13	24	46%	54%	100%
Kyzylorda	10	13	23	43%	57%	100%

Nur-Sultan	101	107	208	49%	51%	100%
Pavlodar	13	25	38	34%	66%	100%
Petropavlovsk	8	15	23	35%	65%	100%
Rudniy	1	1	2	50%	50%	100%
Saryagash		7	7	0%	100%	100%
Semey	12	12	24	50%	50%	100%
Shymkent	195	131	326	60%	40%	100%
Taldykorgan	11	7	18	61%	39%	100%
Taraz	12	15	27	44%	56%	100%
Temirtau	1	1	2	50%	50%	100%
Turkestan	4	5	9	44%	56%	100%
Uralsk	11	18	29	38%	62%	100%
Ust-Kamenogorsk	7	15	22	32%	68%	100%
Zhanaozen	4	2	6	67%	33%	100%
Zhetysay		1	1	0%	100%	100%
Temporary	**141**	**104**	**245**	**58%**	**42%**	**100%**
Aktau	3	2	5	60%	40%	100%
Aktobe	5	4	9	56%	44%	100%
Almaty	55	29	84	65%	35%	100%
Atyrau	8	2	10	80%	20%	100%
Karaganda	6	5	11	55%	45%	100%
Kokchetav	4	2	6	67%	33%	100%
Kostanay	2	4	6	33%	67%	100%
Kyzylorda	3	2	5	60%	40%	100%
Nur-Sultan	15	6	21	71%	29%	100%
Pavlodar	1	3	4	25%	75%	100%
Petropavlovsk		4	4	0%	100%	100%
Semey	3	2	5	60%	40%	100%
Shymkent	28	26	54	52%	48%	100%
Taldykorgan	2	3	5	40%	60%	100%
Taraz	2	2	4	50%	50%	100%

Turkestan	1	2	3	33%	67%	100%
Uralsk	2	4	6	33%	67%	100%
Ust-Kamenogorsk	1	2	3	33%	67%	100%
Total	**1287**	**1187**	**2474**	**52%**	**48%**	**100%**

Labour practices

In 2020, there were two complaints from former employees whose employment contracts were terminated for disciplinary violations. The law requires that, prior to filing a lawsuit, an employee must apply to the conciliation commission of the company. The commission, having considered the employees' applications seeking cancellation of the termination orders and reinstatement in job, dismissed the applications and the former employees went to court. The court has considered the labor disputes and dismissed the applications.

Water consumption

The Company's activity do not have a significant impact on water intake, however, we strive for the rational use of water. The total volume of water used by the Company in the reporting period has amounted to 28,473 cubic meters. Our operations do not re-use water for the provision of telecommunications services. The company uses water only for sanitation and household needs. Our water meters are kept in good technical condition.

Waste management

The waste resulting from our activity includes mainly decommissioned equipment and household waste. Household waste is removed by a contractor – a specialized company licensed for the removal and disposal of waste. The telecommunications and office equipment is written-off and transferred for utilization and recycling on the basis of the contractor's Standard "Rules for Dismantling and Utilization of Written-off Telecommunications Equipment". The decommissioned equipment, cables and office equipment are transferred to a specialized organization licensed to collect, store and dispose of non-ferrous and ferrous metals. The maintenance service decides on the further use of some equipment items as spare parts.

Power consumption and energy efficiency

Energy source	Unit	Consumption of energy from sources OTHER THAN own sources*
2	***3***	***5a***
Electricity	kWh	143,209,608
Heat	Gcal	4,145
Motor gasoline	liter	600,336
Diesel (Gas oils)	liter	135,119
Natural gas	m^3	18,828

Presented above are data from the report submitted to the State Energy Register on energy resources consumed by the company in 2020. No other forms of reporting on energy saving and energy efficiency are stipulated by the Law of the Republic of Kazakhstan No.541-IV "On Energy Saving and Improving Energy Efficiency" (as amended as of January 15, 2019).

Regarding energy saving. Pursuant to the above Law and the relevant rules, company conducts energy audits to identify potential for energy saving. Based on the audit results, the company will develop and approve an action plan. The energy audit results will be provided in the next reporting period.

Greenhouse gas emissions and other air contaminants

Total, in 2020	Consumption	Unit	Units to be converted into conventional tons	Actual emissions for the reporting period (ton)
Gasoline	593,621	liter	1370	433.30

Diesel	6,813	liter	1300	5.24
Total	600,434	liter		438.54

Environmental safety

The company strives to be sustainable by minimizing environmental damage, rational use of natural resources and maintaining the status of a socially responsible organization. In order to minimize the negative environmental impact, Company invests in the modernization of self-contained systems and converts them to more environmentally friendly fuels; carries out land restoration when installing base stations and equipment; tries to use environmentally safe materials and technologies when carrying repair work; organizes voluntary environment-oriented actions and events. The Company has implemented an environmental management system in accordance with the requirements of the international standard ISO 14001.

Biodiversity

The Company complies with all the requirements of Kazakhstan's Environmental Code and performs a proper land assessment to prevent potential environmental damage as well as carries out remediation measures. Our projects always include measures to eliminate the caused environmental damage, such as land reclamation and environmental impact assessment.

Environmental projects

The Green Office Program was launched in 2019 with a view to implement the Environmental Policy, reduce the negative environmental impact as well as to create a friendly environment for employees. The main goal of this project is to reduce the negative impact of the Company's activities on the environment and rational use of resources. In 2020, we started environmental education for the Company's employees.