




**Limited Liability Partnership
"National Maritime Shipping Company
KAZMORTTRANSFLOT**

Document name: Counterparties Due Diligence Policy
of NMSC Kazmorttransflot LLP and its subsidiaries"

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1. PURPOSE OF THE DOCUMENT AND GENERAL PROVISIONS

1.1. The Counterparties Due Diligence Policy of NMSC Kazmortransflot LLP and its subsidiaries has been developed in accordance with the legislation of the Republic of Kazakhstan, the Counterparties Due Diligence Policy of NC KazMunayGas JSC and its subsidiaries and affiliates, the Code of Business Ethics of NMSC Kazmortransflot LLP and other internal documents of NMSC Kazmortransflot LLP.

1.2. The Counterparties Due Diligence Policy of NMSC Kazmortransflot LLP and its subsidiaries regulates the mechanism of Counterparties Due Diligence of NMSC Kazmortransflot LLP, as well as the analysis, processing and storage of information about Counterparties.

1.3. The purpose of this Counterparties Due Diligence Policy of NMSC Kazmortransflot LLP and its subsidiaries is to reduce the risks of material and non-material damage to NMSC Kazmortransflot LLP and its subsidiaries, to limit relationships with unreliable Counterparties, as well as to avoid financial, corruption, reputational and other risks for NMSC Kazmortransflot LLP" and its subsidiaries.

1.4. The Counterparties Due Diligence Policy of NMSC Kazmortransflot LLP and its subsidiaries does not regulate the procedures for checking the Counterparty during procurement through commodity exchanges or at centralized auctions of electric energy.

1.5. The validity of the Counterparties Due Diligence Policy of NMSC Kazmortransflot LLP and its subsidiaries does not apply to labor relations, as well as to contracts concluded between companies belonging to the group of NC KazMunayGas JSC.

2. SCOPE OF APPLICATION

2.1. The Counterparties Due Diligence Policy of NMSC Kazmortransflot LLP and its subsidiaries applies to:

2.1.1. NMSC Kazmortransflot LLP;

2.1.2. subsidiaries of NMSC Kazmortransflot LLP.


2.2. If the internal regulatory documents of subsidiaries or the legislation of the countries of location of subsidiaries establish stricter requirements than the provisions of the Policy, then the provisions of the internal regulatory documents of subsidiaries or the requirements of the legislation are applied.

2.3. The Policy can be applied in accordance with the established procedure by developing and approving similar policies or bringing the internal documents of NMSC Kazmortransflot LLP in line with this Policy. At the same time, the requirements stipulated by this Policy in similar policies and internal documents of NMSC Kazmortransflot LLP should not be reduced.

3. DEFINITIONS AND ABBREVIATIONS

Affiliation	The ability of individuals or legal entities (with the exception of state bodies that carry out control and supervisory functions within the scope of the powers granted to them), be able to directly and/or indirectly determine decisions and/or influence decisions made by each other or one of the persons, including by virtue of a concluded transaction
Samruk-Kazyna JSC (<i>Fund</i>)	Sovereign Wealth Fund Samruk-Kazyna Joint Stock Company
Close relatives	parents (parent), children, adoptive parents (adoptive parents), adopted (adopted), full and half siblings, grandfather, grandmother, grandchildren
Officials	1) persons who, by virtue of a law, other legal act or document of the KMTF, are authorized to act on behalf of the KMTF

	involving investments in the creation of new, expansion and renewal of existing production facilities in order to obtain economic benefits, as well as the acquisition of shares (participation interests) of other legal entities
IT	information technology
KMG	JSC NC "KazMunayGas"
KMTF	NMSC Kazmorttransflot LLP
Counterparty	a natural or legal person with whom KMTF has concluded or is planning to conclude a contract/agreement
Conflict of interest	any situations or circumstances in which the Personal benefit or activity of an Employee or an Official of the KMTF contradicts the interests of the KMTF or may potentially conflict with them and thereby may lead to improper performance of their official duties and affect the objectivity of decisions on issues related to the KMTF
Compliance (English, compliance)	compliance with any internal or external requirements or norms. This is compliance with rules, laws, policies and standards. First of all, this concerns the fight against corruption based on the best international practice
Responsible SD	compliance service / the person responsible for compliance (with respect to KMTF Counterparties), SD/ the person responsible for conducting the audit of Contractors of the SUB (with respect to Contractors of the SUB) / SDRCIS (in terms of checking for information and reference systems in relation to KMTF and SUB counterparties)
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A politically significant person	<p>1) Civil servant - a citizen of the Republic of Kazakhstan, who in accordance with the procedure established by the legislation of the Republic of Kazakhstan occupies a state position in a state body and exercises official powers in order to implement the tasks and functions of the state, paid from the republican or local budgets or from the funds of the National Bank of the Republic of Kazakhstan;</p> <p>2) Official - a person who permanently, temporarily or by special authority performs the functions of a representative of the authorities or performs organizational and administrative or administrative and economic functions in state bodies;</p> <p>3) Foreign official - an official of a foreign state, including members of a foreign public assembly, officials of international organizations, members of an international parliamentary assembly, judges of a foreign state and officials of the international court of Justice, as well as officials in the armed forces and other military formations of a foreign state</p>
RK	Republic of Kazakhstan

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	individual entrepreneur), business identification number (BIN), individual identification number (IIN) and other data
Relatives	brothers, sisters, parents and children of the spouse (spouse)
SD	Structural division
SCRCIS	SD, responsible for corporate and information security
Media	mass media
CIS	Commonwealth of Independent States
EDS/EDMS	electronic document management system

4. APPROACH AND TYPES OF COUNTERPARTY DUE DILIGENCE CHECKS

4.1. KMTF checks the due diligence of Counterparties before entering into contractual relations with them or during contractual relations. The procedures described in the Policy should be applied to all new and existing KMTF Counterparties:

- 1) before the conclusion of the contract with the Counterparty;
- 2) every two years, subject to the preservation of contractual relations with the current Counterparty;
- 3) during contractual relations when establishing information about the change of key persons and/or owners /beneficial owners of the Counterparty.

4.2. Categorization of Counterparties


4.2.1. When checking for the due diligence of Counterparties, KMTF uses a risk-oriented approach.

4.2.2. According to this Policy, all KMTF Counterparties are divided into the following categories:

- 1) Counterparties of Group I,
- 2) Counterparties of Group II.

4.2.3. The counterparties of **Group I** include:

- 1) Samruk-Kazyna JSC and organizations, fifty or more percent of the voting shares (participation interests) of which directly or indirectly belong to Samruk-Kazyna JSC on the right of ownership or trust management;
- 2) state bodies and departments, local self-government bodies, courts;
- 3) organizations owned and controlled by the State of the Republic of Kazakhstan or other states;
- 4) natural monopolies;
- 5) large multinational companies included in the DAX 30², CAC40³, S&P500⁴, EURO STOXX 50⁵, Hang Seng Index ⁶and Nikkei 225 ⁵ indices;
- 6) joint-stock companies traded on the Kazakhstan and Russian Stock Exchanges, the exchange of the Astana International Financial Center and providing quarterly disclosure of financial statements;
- 7) subsurface users who have a subsurface use contract from the Ministry of Energy of the Republic of Kazakhstan;
- 8) Contractors within the framework of fulfilling obligations according to the distribution lists of the departments of agriculture of the Akimats of the regions in accordance with the Schedule of the Ministry of Energy of the Republic of Kazakhstan, for the supply of diesel fuel during spring - autumn field work;
- 9) Contractors within the framework of fulfilling obligations according to the distribution lists of the Departments of Energy and Housing and Communal Services of Akimats regions in accordance with the Schedule of the Ministry of Energy of the Republic of Kazakhstan, for the supply of fuel oil to social and industrial facilities and institutions in the autumn-winter periods;

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plans of the Ministry of Energy of the Republic of Kazakhstan for the supply of liquefied petroleum gas to the domestic market of the Republic of Kazakhstan, including delivery plans through electronic trading platforms and outside electronic trading platforms;

11) oil givers of oil refineries.

4.2.4. KMTF counterparties falling into Group I are not subject to further verification.

4.2.5. The counterparties of **Group II** include:

1) Counterparties engaged in the sale/ purchase of goods/services/works, purchase of fixed assets⁷ above the cost limit according to this Policy;

2) Banks, insurance companies and other financial institutions (without limit) that do not fall into Group I;

3) Associations, foundations, unions, cooperatives, chambers of commerce and other non-profit organizations (without limit);

4) Counterparties involved in the targeted sale of KMTF assets and fixed assets (without limit);

5) Counterparties participating in KMTF investment projects (without limit).

4.3. **Types of verification for the due diligence of the Counterparty**

4.3.1. In accordance with the provisions of the Policy, the following types of Counterparty verification are provided:

1) comprehensive verification of the Counterparty,

2) limited Counterparty verification,

3) verification of the Counterparty on request.

4.3.2. **Comprehensive verification of the Counterparty**

4.3.2.1. The following situations are the grounds for comprehensive verification of the Counterparty:

1) transactions with Counterparties assigned to Group II, provided that the purchase from a potential Counterparty will be made from a single source (except for the cases specified in clause 4.3.3);

2) implementation of investment projects (a set of interrelated measures involving investments in the creation of new, expansion and modernization of existing production facilities/new production facilities in order to obtain economic benefits, as well as the acquisition of shares (participation interests) of other legal entities);

3) sale of KMTF assets and fixed assets, including shares in KMTF companies to third parties (in case of targeted sale).

4.3.3. **Limited Counterparty verification**

4.3.3.1. The following situations are the grounds for limited verification of the Counterparty:


1) The implementation of any procurement by means of a tender, a request for price proposals, when the competitive tender procedure was declared to have taken place, due to the presence of one non-rejected application of a potential supplier to participate in the tender or the presence of one non-rejected price offer of a potential supplier, according to the documents of the Fund regulating the procurement of goods, works and services).

2) Implementation of any procurement by means of a tender/ request for price proposals with limited participation.

4.3.4. **Checking the Counterparty on request**

4.3.4.1. The grounds for checking the Counterparty are official requests from members of the KMTF Supervisory Board, members of the KMTF Management Board, SD for establishing due diligence, possible affiliation, conflict of interest and/or other risks.

4.3.4.2. Verification of the Counterparty on request can be both complex and for the purpose of

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of the Republic of Kazakhstan on the date of sending the application for verification of the Counterparty.

The cost limit for foreign counterparties is 10,000 (ten thousand) US dollars at the exchange rate of the National Bank of the Republic of Kazakhstan on the date of sending the application for verification of the Counterparty.

4.4.3. Counterparties of Group II, the total amount under the contract with which is set below the cost limit, are not subject to further verification. If several contracts are concluded with a Counterparty below the cost limit, while the total amount of such contracts reaches the cost limit, such a Counterparty is subject to verification in accordance with this Policy.

4.5. **The process of initiating verification of the due diligence of the Counterparty**

4.5.1. Before starting the verification of the due diligence of the Counterparty, the Initiator of the request draws up and sends an application for verification of the Counterparty to the Responsible department.

4.5.2. The initiator of the request is a SD employee who:

- 1) is the initiator of the procurement,
- 2) implements an investment project,
- 3) responsible for the targeted sale of the asset,
- 4) determined by the head of the SD.

4.5.3. The initiator of the request is responsible for the following steps before sending the request to the Responsible Department:

- 1) completeness of the provision of data on Counterparties in accordance with the requirements of this Policy and cost limits;
- 2) categorization of the Counterparty into the required group (I or II) and its presence in the lists of exceptions from verification (Group I);
- 3) a request from a Counterparty falling into Group II for a fully completed Counterparty Questionnaire (see [Annex 7](#)), as well as the documents required for its verification (see [Annex 2](#));
- 4) a certificate that all the necessary documents have been provided in accordance with [Annex 2](#). If necessary, the Initiator of the request is obliged to request the missing documents. If any documents cannot be provided, the Initiator of the request is obliged to request an explanation from the Counterparty of the reasons for the absence of such documents;
- 5) sending all submitted documents to the Responsible Department as part of the request for verification of the Counterparty.

4.5.4. The responsible department is responsible for the timely verification of the Counterparty, maintaining a Register of requests received, inspections carried out (including the date of the request, the date of the report and the type of verification) in the form defined by [Annex 3](#) of this Policy.

5. COUNTERPARTIES DUE DILIGENCE VERIFICATION PROCEDURE

5.1. **Comprehensive verification of the Counterparty's due diligence**

5.1.1. Comprehensive verification of the Counterparty is a complete verification of the Counterparty and is carried out as follows:

For legal entities, the employee of the Responsible Department must collect the most accessible information about the Counterparty using open sources of information (information and reference systems) and check the following:

- 1) the main registration data of the Counterparty, including the legal status (active / inactive), the main and additional types of activities, data on the manager and the owner or owners (if possible, it is necessary to establish ownership to an individual or persons) the availability of licenses. If the

- 3) identification of the facts of bringing the managers and/or owners / co-owners of the Counterparty to administrative / criminal responsibility, the presence of tax arrears;
- 4) checking the legal and actual addresses, whether they are mass registration addresses.
- 5) tax registration, the dynamics of tax deductions, the presence or absence of arrears on taxes and other mandatory payments;
- 6) the presence of ongoing litigation, bankruptcy proceedings or enforcement proceedings against the Counterparty;
- 7) the presence of encumbrances on movable and immovable property, on cash;
- 8) availability of accounting (financial) statements for the last available financial year;
- 9) is the Counterparty/ manager and/or owner/co-owner registered in foreign (including offshore) jurisdictions;
- 10) is the Counterparty/manager and/or owner/co-owner affiliated with other KMTF Counterparties, having common beneficiaries, address, phone number, e-mail or website;
- 11) the presence of a Counterparty in the list of unscrupulous suppliers of public procurement and procurement of the Fund;
- 12) the presence of a violation by the Counterparty of the law on Subsoil use;
- 13) whether the head/founder of the Counterparty has enforcement proceedings and a ban on leaving the country;
- 14) determination of the Counterparty's risk level based on the results of categorization by the State Revenue Committee. If a high degree of risk is detected, identify the Counterparty in the red zone;
- 15) is the head of the Counterparty its sole founder;
- 16) does the Counterparty have its own corporate website;
- 17) is the head and/or owner/co-owner of the Counterparty the head of five or more counterparty companies;
- 18) is the Counterparty registered shortly before the conclusion of the contract (360 days or less);
- 19) is the Counterparty registered after the expected date of conclusion of the contract;
- 20) is the Counterparty connected with the members of the tender commission;
- 21) is the Counterparty an inactive legal entity;
- 22) is the Counterparty on the lists for privatization;
- 23) other negative information available in open sources of information, as well as sources officially available to the Responsible department;
- 24) the presence of the Counterparty/its head and/or owner / co-owner in the following lists:
 - a) is the head and/or owner/co-owner of the Counterparty an employee of KMTF;
 - b) is the Counterparty, its managers, or its beneficial owner registered in jurisdictions belonging to the List of offshore zones for the purposes of the Law of the Republic of Kazakhstan "On Countering the Legalization (Laundering) of proceeds from Crime and the financing of Terrorism";
 - c) verification of the presence of the head and/or owner/co-owner of the Counterparty in the **Log for registration and maintenance of information about the Conflict of Interests** according to the internal documents of the KMTF in the field of conflict of Interest resolution for employees and officials;
 - d) is the Counterparty listed in the state registers of unreliable Counterparties;
 - e) information about the presence of a Counterparty/owner/manager in the sanctions lists (international and unilateral - for potential foreign Counterparties), the list of terrorist and extremist organizations whose activities are prohibited on the territory of the Republic of Kazakhstan;

in the lists of KMTF Counterparties with whom claims work is being conducted;

i) is the Counterparty in the list of companies whose activities are prohibited on the territory of the CIS countries;

j) is the Counterparty/manager and/or owner/ co-owner on the wanted list for corruption/economic crimes / or has an outstanding criminal record for corruption/economic crimes;

k) is the Counterparty / manager and/or owner / co-owner in the list of organizations /individuals for whom there is information about their involvement in extremist activities or terrorism.

The list is not exhaustive and can be supplemented during the verification process by employees of the Responsible Department.

For individuals and individual entrepreneurs, the employee of the Responsible Department must collect the most accessible information using open sources of information (information and reference systems) and check the following:

1) compliance of passport data or identity document, registration address, establishment of the possible fact of the presence of several documents in this person;

2) confirmation of the registration of the Counterparty as an individual entrepreneur and identification of the possible fact of suspension or termination of the entrepreneurial activity of such a person;

3) is the Counterparty a politically significant person;

4) is the Counterparty an employee of KMTF;

5) identification of legal entities, the founder, participant and/or head of which is this Counterparty;

6) verification of a person's participation in inactive legal entities;

7) checking tax arrears and writ of execution;

8) facts of bringing the Counterparty to criminal, administrative responsibility, being wanted, participating in litigation, the presence of the results of trials or restrictions (for example, on leaving the country);

9) the presence of the Counterparty in the criminal and other search;

10) the presence of registration of the Counterparty in foreign (including offshore) jurisdictions;

11) is the Counterparty affiliated with other Counterparties, having a common address, phone number, e-mail or website;

12) is the Counterparty connected with the members of the tender commission;

13) the presence of a Counterparty in the following lists:

a) is the Counterparty in the list of debtors with overdue accounts receivable to KMTF or in the lists of KMTF Counterparties with whom claims work is being conducted;

b) is the Counterparty in the list of companies whose activities are prohibited on the territory of the CIS countries;

c) is the Counterparty listed in the register of requests to the KMTF Hotline;


d) information about the presence of a Counterparty in the lists of affiliated persons of KMTF / KMG / Fund;

e) is the Counterparty on the wanted list for corruption/economic crimes;

f) is the Counterparty in the list of organizations/individuals in respect of which there is information about their involvement in extremist activities or terrorism;

g) information about the presence in the sanctions lists (international and unilateral - for potential foreign Counterparties);

h) verification of the presence of the Counterparty in the **Log for registration and**

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5.2. Classification of Counterparty risk levels

5.2.1. During the audit, the Responsible Division assigns the following risk levels to all Counterparties of Group II:

- **Green** risk level;
- **Orange** risk level;
- **Red** risk level.

5.2.1.1. **The green** risk level is assigned to Counterparties for which beneficiaries have been identified, managers for whom no negative information has been found, as well as on the activities of the Counterparty itself, its reputation in the market.

Besides it:

- no conflict of interests, links with sanctions lists, links with politically significant persons, links with terrorist and banned organizations have been identified;
- no claim work is conducted with the Counterparty;
- it is established that the Counterparty's payment discipline is at an acceptable level for KMG;
- The counterparty is able to provide services/ works, deliver goods, fixed assets.

5.2.1.2. **The orange** risk level is assigned in the following cases:

1) Counterparties provide high-risk types of services: marketing, advertising, PR, consulting, legal, information, notary services, training, trainings, seminars, organization of festive and business events, conferences, brokerage services, agents, IT services, capital and current repairs, construction work, rental services of premises, buildings and structures, rental services for trucks and cars, special equipment. The specified list of high-risk services is not exhaustive and can be supplemented by the KMTF at its discretion;

2) the owners and beneficiaries of the Counterparty could not be confirmed in open sources and databases;

3) The counterparty was registered shortly before the conclusion of the contract (360 days or less);

4) the connections of the owners, owners, managers of the Counterparty with Politically significant persons or they are such a person have been identified;

5) negative information was found in public sources regarding the Counterparty;

6) in relation to the Counterparty/owners, top management, court proceedings were initiated related to cases of corruption, bribes, commercial bribery, etc.;

7) there is a declared conflict of interest according to the internal document of the KMTF in the field of Conflict of Interest settlement for employees and officials;

8) over the previous three years, there were overdue payments and outstanding accounts receivable to KMTF;

9) there are doubts about the Counterparty's operating capacity sufficient to fulfill its contractual obligations;


10) the head is listed as the head or owner/ co-owner in five or more Counterparty Companies;

11) The counterparty has not provided information about the corporate website or does not have it;

12) The counterparty has an authorized capital below the minimum threshold established by law;

13) the only contact number of the Counterparty is a mobile phone.

5.2.1.3. This list of signs of a Counterparty with an orange risk level is not exhaustive. During the inspection, the Responsible Department may also identify other signs that can be classified as an **orange** risk level.

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of the request receives the approval of an authorized Official in the form of approval by corporate e-mail, by EDS or by signing a contract by an Official with such a Counterparty.

5.2.1.4. **The red** risk level is assigned when setting any of the criteria listed below (stop criteria), the verification materials are sent to the Initiator of the request and authorized official. The Authorized Official decides on the expediency of cooperation with this Counterparty:

- 1) The counterparty submitted documents with signs of falsification;
- 2) an undeclared conflict of interest was discovered according to an internal document in the field of conflict of interest settlement among employees and officials;
- 3) there is no record of the Resident Counterparty in the corporate register of the Republic of Kazakhstan;
- 4) the Counterparty's identification number in the corporate register of the Republic of Kazakhstan does not correspond to the data provided by the Counterparty;
- 5) The Counterparty does not disclose information about its owners;
- 6) the identification number of the owner or the head of the Counterparty is invalid;
- 7) The counterparty is present in the register of unscrupulous Counterparties (according to the state registers);
- 8) The counterparty, its head and/or owner/co-owner are present in the list of organizations and individuals for whom there is information about their involvement in extremist activities or terrorism;
- 9) The counterparty is in the stage of reorganization, liquidation or bankruptcy;
- 10) The counterparty is registered after the expected date of conclusion of the contract;
- 11) The counterparty is included in the register of messages received to the KMTF Hotline;
- 12) The counterparty / owners / managers are on the lists of companies and persons affiliated with KMTF;
- 13) The counterparty is listed for privatization;
- 14) The counterparty is an inactive legal entity.


5.2.1.4.1. This list of signs of a Counterparty with a **red** risk level is not exhaustive. During the inspection, the Responsible Department may also identify other signs that can be classified as a **red** risk level.

5.2.1.4.2. If the Counterparty has been assigned a **red** risk level, only an authorized Official can make a decision on further interaction (except in cases with an undeclared conflict of interest, the presence of the Counterparty in the lists for privatization or in cases of the Counterparty's presence in the register of messages received to the Hotline). The responsible department provides the results of the verification to the Initiator of the request. The initiator of the request receives the approval of an authorized Official in the form of approval by corporate e-mail, by EDS or by signing a contract by an Official with such a Counterparty.

5.2.2. If the Responsible Division discovers a declared/undeclared Conflict of Interest and/or the presence of the Counterparty on the KMTF affiliate lists, the presence of the Counterparty on the privatisation lists or where the Counterparty is on the register of reports received by the Hotline, the provisions of clause 5.3. should be followed. 5.3. - 5.5. of this Policy.

5.3. Limited Counterparty verification

5.3.1. In the event that KMTF does not have the opportunity to refuse to work with a Counterparty based on the results of tender procedures conducted on the electronic platforms of Samruk-Kazyna JSC, namely, conducting an open or open two-stage tender, requesting price proposals and from one source according to clause 4.3.3 of this Policy, the Initiator of the request sends a request to the Responsible Department for a limited check of the supplier, which is planned to be recognized

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with a "green" risk, the verification of this Counterparty can be completed. Otherwise, the employee of the Responsible Department proceeds to the next steps.

- check whether the managers and the owner/co-owners of the Counterparty are employees of KMG;
- check the information about the presence of the Counterparty, its owners and the head in the lists of KMG affiliates;
- Check the presence of the head and/or owner/co-owners of the Counterparty in the Log for registration and maintenance of information about the Conflict of Interests in accordance with the internal document of KMG in the field of Conflict of Interest resolution for employees and officials.

5.3.3. If there is no Conflict of Interest based on the results of a limited audit, the Tender Commission selects the supplier.

5.3.4. If a declared/undeclared Conflict of Interest and/or the presence of a Counterparty in the lists of KMG affiliates, the presence of a Counterparty in the lists for privatization, or in cases of the presence of a Counterparty in the register of messages received to the Hotline, it is necessary to follow the provisions of paragraphs 5.4.1. - 5.6.1. of this Policy.

5.4. Conflict of interest

5.4.1. If an undeclared Conflict of Interest is detected, the conclusion of a contract with such a Counterparty is prohibited until the circumstances are clarified.

5.4.2. If a declared conflict of interest and/or ties with Politically significant persons is identified, only an authorized Official can accept approval of further interaction with this Counterparty. Approval may be approval of work with a Counterparty by corporate email, by EDS, or by signing a contract by an authorized Official with such a Counterparty.

5.4.3. In the event of an undeclared Conflict of Interest with members of the Tender Commission, a member of the tender commission who has an undeclared conflict of interest should be removed from the Counterparty selection process (does not have the right to vote when choosing a Counterparty).

5.4.4. In the event of a declared Conflict of interest with the members of the Tender Commission, this member of the Tender Commission should be removed from the process of choosing a Counterparty (does not have the right to vote when choosing a Counterparty).

5.4.5. Further settlement of the Conflict of Interests is carried out in accordance with the internal document of KMG in the field of settlement of Conflicts of interests among employees and officials.

5.5. Lists of KMTF affiliates

5.5.1. If a Counterparty, manager, or owner is found in this list, work with this Counterparty or the conclusion of a contract is suspended. The responsible department informs the Initiator of the request within 2 (two) business days.

5.6. The presence of the Counterparty in the register of messages received to the Hotline and/or in the Lists for privatization


5.6.1. If a Counterparty, manager, or owner is found in these lists, work with this Counterparty or the conclusion of a contract is suspended. The responsible department informs the Initiator of the request within 2 (two) business days.

5.6. Checking the Counterparty on request

5.6.1. Verification of the Counterparty on request is optional, is carried out at the request of the SD and may include a comprehensive verification of the Counterparty or elements of a comprehensive audit listed in clause 5.1 in order to establish individual facts.

6. SOURCES OF INFORMATION FOR COUNTERPARTY VERIFICATION

6.1. For the purposes of checking the Counterparty, the Responsible Department may use the

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- 6.1.3. Official state corporate registers, such as the Statistics Committee of the Ministry of National Economy RC11;
- 6.1.4. Portal of the automated information system "Information Service" of the Committee on Legal Statistics and Special Accounts of the Prosecutor General's Office of the Republic of Kazakhstan;
- 6.1.5. World-Check database for checking legal entities and individuals in connection with politically significant persons, organized criminal groups and other risks⁸⁹¹⁰¹¹¹²;
- 6.1.6. Available court registers;
- 6.1.7. Media data and other open sources of information;
- 6.1.8. Forums with reviews of employers/clients/partners containing possible negative information about the Counterparty;
- 6.1.9. Social networks for checking information about key Counterparty persons, such as LinkedIn, Facebook, VK.kz and others.

7. COUNTERPARTY VERIFICATION RESULTS

- 7.1. Verification of the Counterparty's due diligence is carried out using data from open external and internal sources of information, as well as on the basis of documents provided by the Counterparty, within 5 (five) working days from the date of initiation of the request from the relevant SD.
- 7.2. Based on the results of collecting and analyzing the data received about the Counterparty, the employee of the Responsible Department compiles a dossier and forms a report (see [Annex 4](#)) to send the request to the Initiator. The completed Questionnaire of the Counterparty and the documents received from the relevant Counterparty must be attached to the dossier (see [Annexes 1,2](#)).
- 7.3. The results of the Counterparty's verification must be stored electronically for at least three years after the end of the relationship with the Counterparty.
- 7.4. The results of Counterparty inspections are not subject to full or partial transfer to Counterparties or other third parties.

8. THE ACCURACY OF THE VERIFICATION OF THE COUNTERPARTIES' DUE DILIGENCE

- 8.1. The validity period of the verification of the Counterparty with whom KMTF has concluded an agreement is two years.
- 8.2. on expiry of the period specified in clause 8.1. of the Policy and provided that the business relationship with the Counterparty is maintained, the Counterparty shall be re-inspected in accordance with the requirements of this Policy.
- 8.3. If the Initiator of the request becomes aware of the change of the key person and/or the owner of the Counterparty, an extraordinary check of the Counterparty shall be carried out.

COUNTERPARTY QUESTIONNAIRE

SECTION A: General information (to be filled in by the Counterparty)

Name of the legal entity	Business Identification Number (BIN) or other identification number (for foreign companies):
Trademark	Individual identification number (IIN; for individuals):
Legal address	City
	Postal code
Address of the actual location	City
	Postal code
Country	Region /Area
Telephone	Fax
Email address	Organization's website
Date and place of registration	
Core activity	
Full name of the Director General	
Full name of the Chief Accountant	
The name of the servicing bank (specify the bank where the account will be specified in the details for making payments with NMSC Kazmortransflot LLP)	
Bank account number	

SECTION B: Ownership structure (to be filled in by the Counterparty) Provide information about the shareholders and persons under whose control the company is located, including the ultimate beneficiaries

General manager/Management Board/Board of Directors

Provide information about subsidiaries and branches

SECTION B: Information about risks (to be filled in by the Counterparty)

Circle one of the answers to the question and, if necessary, provide additional information.

Is the company or employees of the company at the moment (or in the last five years) under investigation in connection with charges of fraud, corruption, tax evasion, violations of customs legislation or economic sanctions?

NO YES Please provide additional information:

Does the company plan to use other legal entities (subcontractors), including subsidiaries, branches, partnerships or joint ventures, as well as individuals who are not employees of the company, for the purpose of carrying out transactions with NMSC Kazmortransflot LLP?

NO Yes Please provide the name/Full name . and the address of the legal entity /individual, as well as explain the relationship of these persons with the company and what activities they carry out for the company:

Do you know about the employees of NMSC Kazmortransflot LLP, who are supposed to transfer part of the funds paid by NMSC Kazmortransflot LLP to your company? Are you aware of employees of NMSC Kazmortransflot LLP who receive funds from your company, are shareholders or work part-time in your company?

NO Yes Please provide full name position and type of employee interaction of NMSC Kazmortransflot LLP with your company:

Does your company have any outstanding taxes and other fees (including extra-budgetary payments) that exceed 25% of the company's assets in the last financial year, the payment dates of which have already come?

NO YES Please provide additional information:

Have any liquidation procedures been initiated against your company?

NO YES Please provide additional information:

Date: _____

I agree to the processing of personal
data _____
(signature)

If any of the requested information is not provided, the questionnaire will be returned for further filling.

The employee of the Responsible Department must attach the Counterparty's questionnaire to the results of the Counterparty's verification. The result of the Counterparty's verification must be stored for at least two years after the end of the relationship with the Counterparty.

Counterparty's record

Copies of the Counterparty's documents listed below must be certified with an authentic seal and the inscription "The copy is correct" (indicating the signature, position and full name of the employee of the Counterparty who certified the copy (the General Director of the legal entity or personally an Individual entrepreneur).

- 1) Completed Counterparty Questionnaire;
- 2) A copy of the certificate of a registered legal entity, branch or representative office, indicating the founders of this legal entity, received no later than 14 calendar days before the request for documents;
- 3) A copy of the certificate of participation of a legal entity (individual) in other legal entities, received no later than 14 calendar days before the request for documents;
- 4) A copy of the Counterparty's certificate of registration with the tax authority;
- 5) A copy of the Charter with a stamp of registration (if available);
- 6) Extract from the decision of the Counterparty's governing body on the appointment of the General Director; internal orders related to the appointment of the General Director and Chief Accountant; copies of powers of attorney (if applicable);
- 7) Copies of licenses and certificates in accordance with the types of activities within which interaction with the KMTF will be carried out (if applicable);
- 8) Information about ongoing litigation (in which the Counterparty acts as a plaintiff, defendant or third party (if applicable)); otherwise, confirmation that the Counterparty is not involved in any litigation;
- 9) A valid lease agreement or a certificate of ownership of the location address (which confirms the legal address of the Counterparty);
- 10) A copy of the financial statements as of the last reporting date with the seal of the tax authority;
- 11) Notification of the Counterparty's use of the simplified taxation system issued by the relevant tax authority (if applicable);
- 12) Information letter from the tax authority about open accounts in banks.

COUNTERPARTY VERIFICATION REPORT

The basis for the inspection (conclusion of the contract / scheduled inspection / inspection on request)		
Application number		
General information about the Counterparty		
Name		
Organizational and legal form		
Identification number		
Country		
Legal address (city, street, house/building number, office)		
Shareholders and managers (full name)		
Name of the Counterparty's bank		
Counterparty's website		
Verification results		
Assigned risk rating		
Green	Orange	Red Limited verification
Conflict of interest (if any)		Declared Undeclared
The presence of a Counterparty in the list of KMTF affiliates		
Yes		No
The presence of a Counterparty in the list for privatization		
Yes		No
The presence of the Counterparty in the register of messages received by the Hotline		
Yes		No
Agreed payment terms		
Detected risk factors:		
Authorized Official:		Date:
The initiator of the request:		Date: