

	National Maritime Shipping Company "Kazmortansflot" Limited Liability Partnership	
Document: Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmortansflot LLP and its Subsidiaries		
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1. PURPOSE OF THE DOCUMENT AND GENERAL PROVISIONS

1.1. This Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries has been developed in accordance with the Policy of NC KazMunayGas JSC approved by the resolution of the Board of Directors of NC KazMunayGas JSC dated February 13, 2020, Minutes No. 1/2020 and defines the main goals and objectives of managing conflicts of interest in NMSC "Kazmorttransflot" LLP, the participants in the process, their tasks, functions, powers and responsibilities, as well as the principles and stages of conflict of interest management. The Policy defines in detail the basic principles and rules that all Employees and Officials must comply with in order to prevent a situation where their Personal interests may contradict, respectively, the interests of NMSC Kazmorttransflot LLP.

1.2. The purpose of this Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries is to create a unified conflict of interest management system in NMSC Kazmorttransflot LLP, as well as to define requirements for the behavior of Employees and/or Officials to be met to ensure the honest and unbiased performance of their official duties (or responsibilities within any corporate elected bodies, such as committees, commissions, etc.) and impartial decision-making.

1.3. The main objectives of the Policy are:

- 1) consolidation of the basic principles of NMSC Kazmorttransflot LLP in relation to Conflicts of Interest and requirements for Employees and Officials to comply with these principles;
- 2) definition of procedures for disclosure of information about potential Conflicts of interest, mechanisms for making managerial decisions and norms of behavior of Employees and officials in the context of existing Conflicts of interest;
- 3) providing general information to Employees and Officials about the measures taken to identify, manage and Resolve conflicts of interest in NMSC Kazmorttransflot LLP.

1.4. An employee and an Official, performing their official duties, is obliged to put the interests of NMSC Kazmorttransflot LLP above their Personal interests.

1.5. The requirements on the inadmissibility of a Conflict of Interest apply to all Employees and Officials.

1.6. Employees and Officials should take measures to prevent and regulate Conflicts of Interest.

1.7. If Employees and Officials become aware of a Conflict of Interest, they must immediately report such a conflict to the KMTF Hotline.

2. SCOPE OF APPLICATION

2.1. The provisions of this Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries are mandatory for all Employees and Officials of KMTF.

2.2. Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries applies to:

- 2.2.1. NMSC Kazmorttransflot LLP;
- 2.2.2. subsidiaries of NMSC Kazmorttransflot LLP;
- 2.2.3. jointly controlled organizations of NMSC Kazmorttransflot LLP, in the absence of objections from other shareholders/participants of such a jointly controlled organization;
- 2.2.4. joint ventures of NMSC Kazmorttransflot LLP, which are consolidated in the financial

statements of the NMSC Kazmorttransflot LLP group of companies using the equity method.

2.3. If the internal regulatory documents of subsidiaries of NMSC Kazmorttransflot LLP or the legislation of the countries of location of subsidiaries establish stricter requirements than the provisions of this Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries, then the provisions of internal regulatory documents of subsidiaries or legal requirements apply.

2.4. This Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries does not apply to financial investments of the KMTF Group of Companies (companies that are not consolidated for financial reporting purposes).

2.5. The application of this Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries may be carried out in accordance with the established procedure by developing and approving similar policies or bringing internal documents of subsidiaries of NMSC Kazmorttransflot LLP in accordance with this Policy. At the same time, the requirements stipulated by this Policy in similar policies and internal documents of subsidiaries of NMSC Kazmorttransflot LLP should not be reduced.

2.6. If certain provisions of this Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries conflict with traditions, customs or someone's personal ideas about the relevant rules of conduct, the provisions of this Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries shall apply.

3. DEFINITIONS AND ABBREVIATIONS

Close relatives	Parents (parent), children, adoptive parents (adoptive parent), adopted full and incomplete brothers and sisters, grandfather, grandmother, grandchildren
Hotline	Communication channels: KMTF Hotline: Helpline: +7 (7292) 535 823 E-mail: doverie@kmtf.kz Centralized Hotline: Phone: 8 800 080 47 47 (Toll-free on the territory of the Republic of Kazakhstan) WhatsApp: +7 771 191 88 16 Internet portal: www.sk-hotline.kz E-mail: mail@sk-hotline.kz
Officials	Chairman and members of the Board of the KMTF
SB	KMTF subsidiaries
Insider information	reliable information about the securities (derivative financial instruments) of the KMTF, transactions with them, as well as about the KMTF, its activities, which constitute a trade secret, as well as other information not

	known to third parties, the disclosure of which may affect the change in the value of securities (derivative financial instruments) and the activities of the KMTF
Final beneficiary	An individual who directly or indirectly owns more than twenty-five percent of the shares of participation in the authorized capital or placed (minus preferred and repurchased by the company) shares of a legal entity, or exercising control over such a legal entity in another way
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
Competitor	A natural person, individual entrepreneur or a legal entity that provides services (performs work, sells goods) similar to services (works, goods) that renders (performs, sells) KMTF and its SBs
Counterparty	a natural or legal person with whom KMTF has concluded or is planning to conclude a contract/agreement
KMG	NC KazMunayGas JSC
KMTF	NMSC Kazmorttransflot LLP
Personal Interest/Private Interest/Personal Interest/Personal Benefit	The possibility of an official/employee receiving income in the form of money, valuables, other property or services of a property nature, other property and non-property rights for himself/herself or third parties in the performance of his/her official duties
Policy	Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmorttransflot LLP and its Subsidiaries
Politically significant person	<ol style="list-style-type: none"> 1) A civil servant is a citizen of the Republic of Kazakhstan who holds a public position paid from the republican or local budgets or funds of the National Bank of the Republic of Kazakhstan in the state body and exercises official powers for implementation of tasks and functions of the state in the order established by the legislation of the Republic of Kazakhstan; 2) An official is 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; 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
Employee	a person who is in an employment relationship with the KMTF and directly performs work under an employment contract, as well as other persons involved under the agreement through agencies and a contract of a civil nature
Relatives	full and incomplete brothers and sisters, parents and children of the spouse
Conflict of interests management	creation of mechanisms to prevent situations in which the private interests of an Official or Employee may affect the objectivity of their decision-making and the performance of their official duties, as well as conflict with their obligation to act in the interests of the KMTF
Resolving conflicts of interests	actions of appropriate bodies and/or persons capable and competent to make managerial decisions, as a result of which the negative consequences of a probable or occurred Conflict of interests of an Employee and/or an official are excluded
BU	business unit
BURM	BU, or a KMTF employee responsible for monitoring compliance with this Policy
BURCIS	BU, responsible for corporate and information security
BU HRM	BU responsible for human resource management
BU LS	BU responsible for legal support

4. RESPONSIBILITY

4.1. **KMTF BURM** is responsible for the implementation, clarification of the provisions of this Policy to Officials and Employees, and also monitors the effectiveness of the implementation of the requirements set out in this Policy, with the formation of relevant reporting materials to the KMTF Supervisory Board.

4.2. The managers of the KMTF BU should ensure that their Employees are familiar with this Policy.

4.3. Responsibility for compliance with the requirements of this Policy lies with every Employee, regardless of their position and on every Official.

4.4. Employees and Officials are personally responsible for timely identification of a conflict of their Personal Interests with the interests of the KMTF, timely declaration of a Conflict of Interests, as well as for active participation in the settlement of a real or potential Conflict of interests.

4.5. The KMTF considers concealment or/and intentionally untimely or incomplete disclosure of information about a Conflict of Interest as an abuse of trust and deception.

Failure to comply with the provisions of the Policy may be considered as a disciplinary offense and

serve as a basis for bringing an Employee to disciplinary responsibility.

4.6. Employees and Officials are fully responsible for resolving issues related to their Private Interests in such a way as to avoid Conflicts of Interest arising in connection with their appointment or subsequent tenure.

4.7. Employees and Officials should always act in such a way as to serve as an example of good and ethical behavior for other Officials and Employees and actively support the implementation of the Policy.

4.8. Employees and Officials are required to mitigate any consequences of a Conflict of Interest, including, if applicable, minimizing losses or compensating for damages to the KMTF.

5. TYPES OF CONFLICTS OF INTEREST

5.1. A conflict of interest may include the following situations:

5.1.1. Using Insider Information for personal purposes

1) implementation by an Employee or an Official directly or indirectly of transactions using Insider Information for Personal gain;

2) the Employee's use of any confidential information (including, but not limited to personal data, trade secrets), access to which the Employee or Official received in connection with the performance of official duties for the purpose of obtaining Personal benefits;

3) transfer of KMTF Insider Information or any confidential KMTF information to third parties (including personal data of Employees and representatives of KMTF Counterparties, trade secrets);

5.1.2. Abuse of official authority and neglect of official duties

1) combining executive and control functions by an employee, allowing them to use their job responsibilities for personal gain;

2) abuse of authority by an employee or an Official in order to obtain Personal benefits;

3) the creation of obstacles by one Employee or Official to the performance of official duties by another Employee or Official, including for the purpose of obtaining Personal benefits;

4) involvement in the decision-making process and determination of own remuneration;

5) participation or influence, directly or indirectly, on a business decision, process or transaction in the course of KMTF activities, in which Personal interests will conflict with the interests of KMTF;


6) participation for profit or other Personal gain in a transaction in which KMTF is one of the parties, unless such participation was first approved in writing by the authorized body;

5.1.3. Performing the functions of an Employee and an Official in the KMTF

1) hiring or changing the job responsibilities of an Employee, as a result of which the Employee and his Close relative, spouses, Relatives will be directly subordinate and make any personnel decisions regarding a Close relative, spouse, Relatives (including making a decision on salary changes, awarding bonuses, assigning certain functions, promotion, etc.);

2) appointment or election of an Official, as a result of which the Official will make any personnel decisions regarding a Close relative, spouse, Relatives;

3) work or performance of functions with Close relatives, spouses, Relatives in one collegial body of the KMTF or its UP to;

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5.1.4. Conflict of interest in tender procedures

1) the tender procedures involve a legal entity in which the Employee - member of the tender commission has a share in the authorized/share capital, or the Employee is the beneficial owner of such a legal entity;

2) the tender procedure involves a legal entity in which a Close relative, spouse, Relatives of an Employee - member of the tender commission or a close relative, spouse, Relatives of such an Employee have a share in the authorized/share capital of such a legal entity;

3) Employee - a member of the tender commission and/or Close relatives, spouses, Relatives own securities of the legal entity that submitted an application for participation in the tender procedure;

5.1.5. Employment and business activity outside the KMTF and its UP to

1) appointment to a managerial position, election or appointment to a management body as a member of the Board of Directors or a shareholder of a Counterparty and/or Competitor while maintaining the current position in KMTF and its subsidiaries. This provision is also applicable to Close relatives, spouses, Relatives, except in cases when an Employee/Official has informed in a timely manner about the existence of a Conflict of Interest;

2) participation of an Employee or an Official, as well as their Close relatives, spouses, Relatives in the activities of the Counterparty, implying the Employee's preference for the interests of one Counterparty to the detriment of the interests of another in order to obtain Personal benefits and/or the Employee's preference for his own interests to the detriment of the interests of the Counterparty in order to obtain Personal benefits;

3) the contradiction between the interests of the KMTF and the interests of other legal entities or individual entrepreneurs, in which the Employee or Official is an Employee/The ultimate beneficiary. Due to employment in the work of the specified legal entity or participation / ownership of another legal entity, it is impossible for KMTF to perform its duties in good faith by an Employee;

4) competition with KMTF and its subsidiaries, including, without limitation, competition on any business transactions and investment projects;

5) acquisition or retention of a Personal Interest in one of the assets of the KMTF or its Subsidiaries or its Counterparties without prior notification to the KMTF and obtaining written permission from the authorized body. In case of refusal of this interest (sale of his share, re-registration of ownership rights, etc.), the conflict of interests persists if the Employee continues to influence the Counterparty. The settlement of the conflict of interests takes place in accordance with this Policy;

6) provision of services by Employees to Contractors, part-time work with Contractors;

7) conclusion of contracts with former Employees, as well as with legal entities with which former Employees are affiliated, if less than 2 (two) years have passed since the termination of the employment relationship with such an Employee years;

8) investing in any company with which KMTF carries out its activities if an Employee or an Official and/or affiliated persons influence decision-making in such a company;

5.1.6. Interaction with politically significant persons

1) the presence of personal interest in interacting with Politically significant persons within the framework of the Employee's official duties in the KMTF.

5.2. The list given in paragraph 5.1 of the Policy is not exhaustive. KMTF employees and officials should independently assess the existence of a Conflict of Interest in other situations.

5.3. When the BURM identifies cases of Conflict of Interest that are not included in the list from paragraph 5.1, but satisfy the definition of "conflict of interest":

- 1) The employee is notified of the violation (without any subsequent sanctions);
- 2) The identified Conflict of Interest must be resolved in accordance with this Policy.

6. REQUIREMENTS FOR DISCLOSURE OF INFORMATION ABOUT A CONFLICT OF INTEREST

6.1. In the event of a Conflict of Interest, the Employee and/or Official are obliged to immediately and fully disclose information about the Conflict of Interest, as well as actively contribute to its settlement.

6.2. An employee and/or an Official must send information about Conflicts of Interest to the BURM. For this purpose, BURM maintains a log for registration and maintenance of information on conflicts of interest in accordance with Annex 1 to this Policy (hereinafter referred to as the registration log). The journal is maintained in paper or electronic form.

6.3. At the same time, the KMTF undertakes:

- 1) to maintain the confidentiality of the disclosure of information about the Conflict of interest and the process of its settlement;
- 2) to protect an Employee and/or an Official from prosecution in connection with a Conflict of Interest that was disclosed and resolved in a timely manner;
- 3) update the logbook on a regular basis.

6.4. Disclosure of information about a Conflict of Interest should be carried out by an Employee and/or an Official in writing and in the most understandable form.


6.5. On a quarterly basis, the KMTF BURM sends the registration log to the KMG Compliance Service for review and approval.

7. PROCEDURE FOR DISCLOSURE OF INFORMATION ABOUT A CONFLICT OF INTEREST

7.1. Employees and Officials must immediately disclose to BURM all cases of Conflict of Interest. In case of doubt regarding the presence/absence of a potential or real Conflict of Interest, Employees and Officials should contact the KMTF BURM for clarification.

7.2. The following procedure for disclosure (declaration) of cases of Conflict of Interests is established:

- 1) Initial disclosure of a Conflict of Interest by Employees and/or Officials when hiring/appointing to a position (filling out an application form in accordance with Annex 2 to this Policy);
- 2) Disclosure of information about a possible Conflict of Interest in the appointment and entry of an Employee into a new position (filling out an application in the form according to Annex 4 in case of a Conflict of Interest or in the form according to Annex 3 in the absence of a Conflict of Interest);
- 3) Annual filling out by Employees and Officials of a form on the presence/absence of a Conflict of interest (filling out an application on the form according to Annex 4 in case of a Conflict of interest or

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on the form according to [Annex 3](#) in case of absence of a Conflict of interest);

4) One-time disclosure of information about a Conflict of Interest as situations arise that give rise to a new real or potential Conflict of Interest or when circumstances change (according to [Annex 4](#);

5) Each Employee signs the sheet of familiarization with this Policy in accordance with the form in accordance with [Annex 5](#). The signed form is stored at the [BU HRM](#), in the personal file of the Employee/Official, a copy of the signed form is transmitted to the [BURM](#).

7.3. If the circumstances of the Employee or Official have changed and the Conflict of Interests no longer exists, this change must be registered by the [BURM](#) in the registration log in accordance with the form of [Annex 1](#) of the Policy.

7.4. Forms according to [Annex 2](#), [Annex 3](#) and [Annex 4](#) are kept in paper or electronic form.

8. MEASURES TO RESOLVE CONFLICTS OF INTEREST

8.1. Information about the presence of a real or potential Conflict of Interest among Employees and/or Officials should be checked within no more than 5 (five) business days from the date of receipt for consideration by the [BURM](#) in order to assess the severity of the risks arising for the KMTF.

8.2. [BURM](#) immediately informs the Chairman of the Board of the KMTF (or a person replacing him) about the revealed facts of a Conflict of Interest in order to choose the most appropriate form of resolving this conflict.

8.3. To resolve the Conflict of interests, a commission is formed, which will include all interested parties. The composition of the commission is determined by the [BURM](#) and may include representatives of the following departments: [BURM](#), [BU HRM](#), [BURCIS](#), [BU LS](#), [BU](#), or a KMTF employee responsible for organizing internal audits, Heads of the BUs.

8.4. In each specific case of Conflict of Interest settlement, by agreement of the KMTF and the Employee and/or the Official who disclosed information about the Conflict of Interest, various conflict resolution measures can be determined:

(a) suspension (permanently or temporarily) from participation in the discussion and decision-making process on issues that are or may be influenced by a Conflict of Interest;

(b) revision and modification of the scope of duties and labor functions of an employee and/or an official;

(in) transfer/re-election of an Employee and/or an Official to a position providing for the performance of labor functions not related to a Conflict of interests (with the consent of the Employee/Official);

(d) refusal of an Employee from a Private interest that generates a conflict with the interests of the KMTF;

(e) termination of the contract with the Counterparty in which the Employee and/or Official has a Private Interest, as well as a moratorium on renegotiating the contract with the Counterparty for one year if the Employee and/or Official ceases to own or be the Ultimate Beneficiary of the Counterparty;

(e) termination of the employment contract with an Employee and/or termination of the contract with an Official.

8.5. If, as a result of the Settlement of a conflict of interest, an Employee and/or an Official ceases to own or be the Ultimate Beneficiary of a Counterparty or Competitor, and if, as a result of such

actions, the Conflict of Interest can be considered settled, then the Employee and/or Official must report the absence of a Conflict of Interest in accordance with Annex 3 to this Policy.

8.6. This list of measures to resolve conflicts of interest is not exhaustive.

8.7. Employees and Officials, performing their official duties, are obliged to put the interests of the KMTF above their Private interests and be guided solely by the interests of the KMTF when solving business issues. The decision-making process should not depend on the religious, ethnic, political, family or other personal preferences of the decision-maker. Not all Personal interests, relationships, influences, or actions automatically create a Conflict of Interest. Employees should be guided by common sense, taking into account all relevant requirements of this Policy.

8.8. KMTF has the right, at its sole discretion, to prohibit certain Conflicts of Interest among its Employees if such conflicts pose a significant risk to the interests or reputation of KMTF and if such prohibitions do not contradict the legislation of the Republic of Kazakhstan and the legislation of those countries where KMTF is registered and/or conducts its business.

8.9. Employees are allowed to invest directly or indirectly in any company with which KMTF and its subsidiaries carry out their activities, if the Employee or Official and/or affiliated persons do not influence decision-making in such a company.

9. MONITORING OF THE REGISTER OF CONFLICTS OF INTEREST

9.1. BURM KMTF carries out regular monitoring and verification of the register of Conflicts of interest. Verification can be carried out in the following ways:

(a) examination of documents and information on procurement activities to identify signs of a conflict of interest;

(b) verification of information about the chain of ownership of potential Counterparties, including information about the Final Beneficiary;

(in) verification of the information specified in the Declarations of Conflict of Interest, in accordance with the procedure provided for by this Policy;

(d) monitoring of mass media and other sources and implementation of timely response to the facts of the appearance of negative information about the KMTF;

(e) other methods and methods provided for by the internal documents of the KMTF and do not contradict the legislation of the Republic of Kazakhstan or other applicable legislation.

Annex 1

Log on identified conflicts of interest among Employees and Officials

№	Full name of employee, BU	Conflict of Interests description	Notifications date of conflict of interest	Date of conflict of interest settlement (if applicable)	Status of settlement (details/form of conflict of interest settlement)	Signature of employee	Signature of direct Manager

INITIAL DISCLOSURE OF INFORMATION ABOUT POSSIBLE CONFLICT OF INTEREST

city _____

1. Information on securities issued by Counterparties:

Types of securities: stock, bond, promissory note, Eurobond, corporate bond, unit, derivative financial instrument (note, option, futures, forward, etc.).

I provide information about my intention and/or the intention of Close relatives/spouses/Proper owners to purchase securities issued by Counterparties:

No s/i	Nominee holder/owner, place of storage of securities	Type of securities	Issuer	Quantity (pcs.)

2. Information on beneficial ownership/equity participation and management in the Counterparty companies / Competitors of KMTF and its subsidiaries:

The name of the legal entity (Counterparty/Competitor) in which there is/is supposed to be my participation and/ or my Close relatives / spouses / Relatives as owners is indicated/Final beneficiaries and/or management. It also indicates the intention to acquire any assets/shares in legal entities that may become objects of interest of the KMTF and its subsidiaries.


The amount of participation is indicated in tenge (and/or in another currency) as of the date of the Application, indicating the share in the total capital of the legal entity.

No s/i	Legal entity	Participation amount	Participation currency

3. Information about participation in the sole and collegial bodies of Counterparties or Competitors of the KMTF and its subsidiaries:

The name of the legal entity, in the bodies of which the applicant and / or its close relative / spouse / relative participates or is an official . The type of participation is indicated (participation in the Supervisory Board, participation in the Board of Directors, participation in the Management Board, PART ¹, etc.).

No s/i	Legal entity	Type of involvement

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4. Links to Politically Exposed Persons

4.1. I hereby notify you of the emergence of personal interest / possible / emerging / existing conflict of interest/ connection with Politically significant persons (underline):

№ s/i	Possible conflict of interest (<i>it is necessary to describe what the conflict of interest / personal interest is expressed in</i>)

4.2. I hereby notify you that I or my Close relatives/spouse/Relatives are/were Politically significant persons (1. specify the name of a close relative, position, place of work, period of work; 2. specify the positions you previously held, places of work, period of work)

№ s/i	Full name of a close relative/Applicant	Job title	Place of work	Period of work

5. Other disclosure of information

5.1. I hereby notify that I or my Close relatives/spouse/Relatives intend to acquire assets belonging to KMG, KMTF and/or its subsidiaries:

No. s/i	Full name of a close relative/Applicant	Asset

5.2. I hereby notify you about the provision of services/ other interaction with KMTF Counterparties and its subsidiaries:

No. s/i	Counterparty	Type of interaction (for example, provision of any services)

5.3. I hereby notify you that my following Close relatives/spouse/Relatives are working in KMG, KMTF and its subsidiaries or have been appointed to the position:

No. s/i	Full name of a close relative/spouse	Position held by a Close Relative / Spouse / Related Person



Full name, position, department

Signature: _____

BURM¹ ("Reviewed"):

(Full name, position, Signature)

STATEMENT ON THE ABSENCE OF A CONFLICT OF INTEREST

_____ 20__

city _____

I hereby confirm that:

- I do not have a conflict of interest/personal interest that affects or may affect the impartial performance of my official duties;
- I do not own personally, as well as through affiliated persons, ownership shares/shares of KMTF competitor organizations and/or its subsidiaries;
- I do not use corporate property, information or official position for the purpose of obtaining personal gain, or participating in competition with KMG, KMTF and/or its subsidiaries;
- I do not abuse my official position to obtain personal benefits that may arise as a result of activities, including, but not limited to activities related to sales or purchases of KMTF and/or its subsidiaries, with the sale and purchase of assets, investment of funds of KMTF and/or its subsidiaries, etc.;
- I am not a director, shareholder, partner, affiliated or otherwise related person of the KMTF Counterparty and/or its subsidiaries;
- I perform my official duties in strict accordance with the provisions of the Charter, the Code of Business Ethics and other internal documents of the KMTF;
- I have notified about all family ties with Politically significant persons;
- I have notified about my previous positions as a Politically Significant person;
- in the event of a potential conflict of interest, I undertake to notify you immediately.

Full name, position of the Applicant, business unit

Signature: _____

BURM¹ ("Reviewed"):

(Full name, position, Signature)

**DISCLOSURE OF INFORMATION ABOUT POSSIBLE CONFLICT OF INTEREST WHEN HOLDING A
NEW POSITION AND CHANGING CIRCUMSTANCES**

_____20_____

city _____

I hereby declare a potential conflict of interest.

1. Information on securities issued by Counterparties:

Types of securities: stock, bond, promissory note, Eurobond, corporate bond, unit, derivative financial instrument (note, option, futures, forward, etc.).

I provide information about my intention and/or the intention of Close relatives/spouse to purchase securities issued by Counterparties:

№ s/i	Nominee holder/owner, place of storage of securities	Type of securities	Issuer	Quantity (pcs.)

2. Information on beneficial ownership/equity participation and management in the KMTF

Counterparty/Competitor companies and/or its subsidiaries:

The name of the legal entity (Counterparty/Competitor) in which there is/is supposed to be my participation and/or my Close relatives/spouse is indicated/Property owners as owners/Final beneficiaries and/or management. It also indicates the intention to acquire any assets/interests in legal entities that may become objects of interests of KMTF and/or its subsidiaries.

The amount of participation is indicated in tenge (and/or in another currency) as of the date of the Application, indicating the share in the total capital of the legal entity.


№ s/i	Legal entity	Participation amount	Participation currency

3. Information about participation in the sole and collegial bodies of Counterparties or Competitors of KMTF and/or its subsidiaries:

The name of the legal entity in whose bodies the applicant and/or his Close relative/spouse participates or whose official is indicated.

The type of participation is indicated (participation in the Supervisory Board, participation in the Board of Directors, participation in the Management Board, Unified Automated Bidding Information System, etc.).

№ s/i	Legal entity	Type of involvement

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4. Relations with politically important persons

4.1. I hereby notify you of the emergence of personal interest / possible / emerging / existing conflict of interest/ connection with Politically significant persons (underline):

№ s/i	Possible conflict of interest (<i>it is necessary to describe what the conflict of interest / personal interest is expressed in</i>)

4.2. I hereby notify you that I or my Close relatives/spouse/Relative are/were Politically significant persons (1. specify the full name of a close relative/spouse, position, place of work, period of work; 2. specify the positions you previously held, places of work, period of work)

№ s/i	Full name of a close relative/spouse/Applicant	Job title	Place of work	Period of work

5. Other disclosure of information

5.1. I hereby notify that I or my Close relatives/spouse intend to acquire assets belonging to KMG, KMTF and/or its subsidiaries:

No. s/i	Full name of a close relative/spouse/Applicant	Asset

5.2. I hereby notify you about the provision of services/ other interaction with Counterparties:

No. s/i	Counterparty	Type of interaction (for example, provision of any services)

5.3. I hereby notify you of the occurrence of a conflict of interest in the tender procedure

No. s/i	Tender procedure	Descriptions of the conflict of interest in the tender procedure

5.4. I hereby notify you that my close relatives/spouse are working for KMG, KMTF and/or its subsidiaries or have been appointed to the position:

No. s/i	Full name of a close relative/spouse	Position held by a close relative/spouse



I hereby confirm that all the information provided in the application is complete, truthful and reliable.

Full name, position, department

Signature: _____

BURM¹ ("Reviewed"):

(Full name, position, Signature)



FAMILIARIZATION SHEET
with the Policy of Resolving Conflicts of Interest among Employees and Officials of NMSK Kazmorttransflot LLP and its subsidiaries

EMPLOYEES OF NMSK Kazmorttransflot LLP

By signing this familiarization sheet, Employees/Officials confirm that they have read and understood all the points of this Policy, all the necessary explanations have been received.

**FULL NAME, POSITION OF THE APPLICANT,
NAME OF THE DIVISION**

SIGNATURE

_____	_____
_____	_____
_____	_____

Responsible person ("Agreed"):

(Full name, position, Signature)