

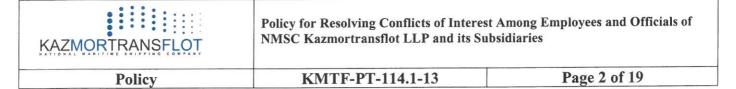
National Maritime Shipping Company "Kazmortransflot" Limited Liability Partnership

Document: Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmortransflot LLP and its Subsidiaries

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| Developed by: Compliance Officer - Murzakhanov Y.S., | Approved by the resolution of the KMTF Board as of December 7, 2022 Minutes No. 25 | Approved by the resolution of the KMTF Supervisory Board dated March 7, 2023 Minutes No.01-23/NS |

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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 Kazmortransflot 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 "Kazmortransflot" 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 Kazmortransflot LLP.
- 1.2. The purpose of this Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmortransflot LLP and its Subsidiaries is to create a unified conflict of interest management system in NMSC Kazmortransflot 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 Kazmortransflot 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 Kazmortransflot LLP.
- 1.4. An employee and an Official, performing their official duties, is obliged to put the interests of NMSC Kazmortransflot 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 Kazmortransflot 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 Kazmortransflot LLP and its Subsidiaries applies to:
- 2.2.1. NMSC Kazmortransflot LLP;
- 2.2.2. subsidiaries of NMSC Kazmortransflot LLP;
- 2.2.3. jointly controlled organizations of NMSC Kazmortransflot LLP, in the absence of objections from other shareholders/participants of such a jointly controlled organization;
- 2.2.4. joint ventures of NMSC Kazmortransflot LLP, which are consolidated in the financial

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

- 2.3. If the internal regulatory documents of subsidiaries of NMSC Kazmortransflot 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 Kazmortransflot 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 Kazmortransflot 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 Kazmortransflot 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 Kazmortransflot 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 Kazmortransflot LLP should not be reduced.
- 2.6. If certain provisions of this Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmortransflot 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 Kazmortransflot 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 | | | |



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| | 1 to third morting the displacement of which may affect |
|--------------------------------|---|
| | 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 Kazmortransflot LLP |
| Personal Interest/Private | The possibility of an official/employee receiving income in |
| Interest/Personal | the form of money, valuables, other property or services of |
| Interest/Personal Benefit | 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 Kazmortransflot LLP |
| | and its Subsidiaries |
| Politically significant person | 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 |
| | |



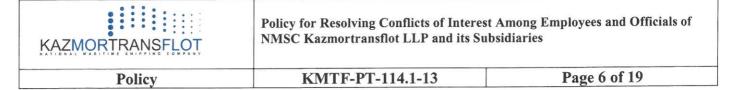
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| | members of a foreign public assembly, officials of | |
|----------------------------------|--|--|
| | international organizations, members of an international | |
| | parliamentary assembly, judges of a foreign state and | |
| | officials of the 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 | actions of appropriate bodies and/or persons capable and | |
| interests | 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 | |
| DU LS | BO responsible for regar 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

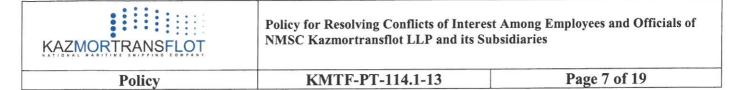


serve as a basis for bringing an Employee to disciplinary responsibility.

- 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.

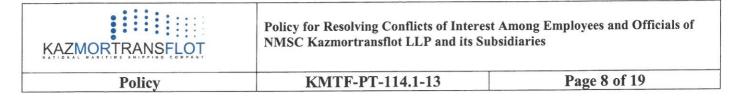
5. TYPES OF CONFLICTS OF INTEREST

- 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;



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.



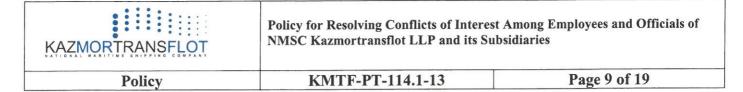
- 5.3. When the <u>BURM</u> identifies cases of Conflict of Interest that are not included in the list from paragraph 5.1, but satisfy the definition of "conflict of interest":
 - 1) The employee is notified of the violation (without any subsequent sanctions);
 - 2) The identified Conflict of Interest 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 <u>BURM</u>. For this purpose, BURM maintains a log for registration and maintenance of information on conflicts of interest in accordance with <u>Annex 1</u> 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 <u>BURM</u> 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 <u>BURM</u> 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

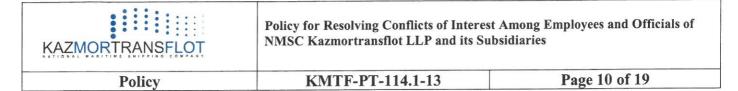


on the form according to <u>Annex 3</u> in case of absence of a Conflict of interest);

- 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 <u>Annex 5</u>. The signed form is stored at the <u>BU HRM</u>, in the personal file of the Employee/Official, a copy of the signed form is transmitted to the <u>BURM</u>.
- 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

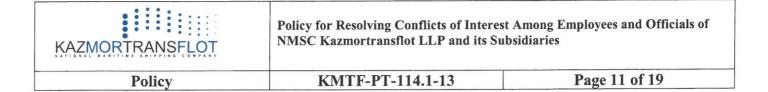


actions, the Conflict of Interest can be considered settled, then the Employee and/or Official must report the absence of a Conflict of Interest in accordance with <u>Annex 3</u> to this Policy.

- 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. <u>BURM KMTF</u> 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

| N₂ | 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 |
|----|------------------------------|---|--|---|--|--------------------------|-----------------------------------|
| | | | | | | | |



option, futures, forward, etc.).

No

No

s/i

securities issued by Counterparties:

1. Information on securities issued by Counterparties:

Nominee holder/owner, place of storage of securities

Policy for Resolving Conflicts of Interest Among Employees and Officials of NMSC Kazmortransflot LLP and its Subsidiaries

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Annex 2

Quantity

Type of involvement

INITIAL DISCLOSURE OF INFORMATION ABOUT POSSIBLE CONFLICT OF INTEREST

Types of securities: stock, bond, promissory note, Eurobond, corporate bond, unit, derivative financial instrument (note,

I provide information about my intention and/or the intention of Close relatives/spouses/Proper owners to purchase

city___

Type

of

Issuer

| s/i | Nominee holder/owner, place of storage of securities | securities | Issuer | (pcs.) |
|--|---|------------------------------------|-----------------------------------|--|
| | | | | |
| | | | | |
| | formation on beneficial ownership/equity participmpanies / Competitors of KMTF and its subsidian | | nagement in t | he Counterparty |
| Close i intentic subsidi The an | me of the legal entity (Counterparty/Competitor) in whic relatives / spouses / Relatives as owners is indicated/Fina on to acquire any assets/shares in legal entities that i iaries. mount of participation is indicated in tenge (and/or in ting the share in the total capital of the legal entity. | l beneficiaries a nay become ob | nd/or managem jects of interes | nent. It also indicates the tof the KMTF and it. |
| № s/i | Legal entity | Partici | pation amount | Participation currency |
| | | | | |
| 3. Inf | formation about participation in the sole and coll | egial bodies of | Counterpart | ies or Competitors |

Legal entity



| THISE REZIDITE AUSTOCE DEL ANA ILS SUBSICIALIES | | |
|---|---------------|--|
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| | | |

4. Links to Politically Exposed Persons

| No Possible conflict of interest (it is necessary to describe what the conflict of interest / personal | | | | | erest / personal interest |
|--|--------|--|-----------------------|----------------------------|--------------------------------------|
| s/i expressed in) | | | | | |
| | | | | | |
| | | | | | |
| the na | me of | notify you that I or my Close relative, position, place of riod of work) | | | |
| № s/i | | Full name of a close relative/Applicant | Job title | Place of work | Period of work |
| | | | | | |
| 5. Ot | her di | isclosure of information | 3.94 MARK 1997 | | |
| | | y notify that I or my Close relative bsidiaries: | s/spouse/Relatives in | ntend to acquire assets be | longing to KMG, KMTF |
| | . s/i | Full name of a close rela | tive/Applicant | | Asset |
| | | | | | |
| | hereby | notify you about the provision of | services/ other inter | action with KMTF Coun | terparties and its |
| No | . s/i | /i Counterparty | | | for example, provision of services) |
| | | | | | |
| | | | | | |
| | | y notify you that my following Clo or have been appointed to the pos | | Relatives are working in l | KMG, KMTF and its |
| | . s/i | Full name of a relative/spou | close | | Close Relative / Spouse / ted Person |
| | | | | | |



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| Full name, position, departm | ent | |
|------------------------------|----------------------------------|---|
| | | |
| Signature: | | |
| BURM¹ ("Reviewed"): | | |
| | (Full name, position, Signature) | - |



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Annex 3

STATEMENT ON THE ABSENCE OF A CONFLICT OF INTEREST

| | 20 city |
|-------------------|--|
| | City |
| | y confirm that: I do not have a conflict of interest/personal interest that affects or may affect the impartial performance of my duties; |
| | I do not own personally, as well as through affiliated persons, ownership shares/shares of KMTF competitor ations and/or its subsidiaries; |
| | I do not use corporate property, information or official position for the purpose of obtaining personal gain, or ating in competition with KMG, KMTF and/or its subsidiaries; |
| but not | I do not abuse my official position to obtain personal benefits that may arise as a result of activities, including, limited to activities related to sales or purchases of KMTF and/or its subsidiaries, with the sale and purchase of 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 idiaries; |
| | I perform my official duties in strict accordance with the provisions of the Charter, the Code of Business Ethics er 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 nam | ne, position of the Applicant, business unit |
| | |
| | |
| | |
| Signature | e: |
| BURM ¹ | ("Reviewed"): |
| | (Full name, position, Signature) |



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Annex 4

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.

| Nº 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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|---------------------------------------|--|--|--|-----------------------------|---|---|
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| | | | | | | |
| 4.1 | Relations with politically in a large street it is a large street it is a large street with the street it is a large street with the street it is a large street with the street in the street is a large street with the street in the street is a large street with the street in the street is a large street in the street in the street is a large street in the street i | nergence of personal is | nterest / possible | emerging / | existing conflic | et of interest/ connec |
| № s/i | Possible conflict of interest expressed in) | est (it is necessary to | o describe what | the conflic | ct of interest / | personal interest |
| l nam | . I hereby notify you that I of e of a close relative/spouse, po | r my Close relatives/sp sition, place of work, p | oouse/Relative are period of work; 2. | were Politic | cally significant | t persons (1. specify reviously held, place |
| ork, pe No | eriod of work) Full na | me of a close | | | Place | Period of work |
| s/i | relative/sp | pouse/Applicant | | Job title | of work | Fellod of work |
| | | | | | k | |
| l. Ih | | | | belonging to | o KMG, KMTF | |
| No. s | reby notify that I or my Close Furelation | relatives/spouse intend ill name of a close ve/spouse/Applicant | interaction with C | Counterpartie | As | set |
| No. s 2. I he No. s | reby notify that I or my Close Furelation reby notify you about the proverse of the contract | relatives/spouse intended in the control of a close ve/spouse/Applicant dision of services/ other downterparty | interaction with (| Counterparties Type of inte | As es: raction (for ex any service | set |
| 1. I he No. s 2. I he No. s 4. I he | reby notify you about the proving the prov | relatives/spouse intended in the control of a close ve/spouse/Applicant dision of services/ other downterparty dece of a conflict of interprocedure delatives/spouse are worked are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a close of a close of a conflict of interprocedure delatives/spouse are worked as a close of a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a conflict of interprocedure delatives/spouse are worked as a close of a close of a conflict of interprocedure delatives/spouse are worked as a close of | interaction with O | Counterpartie Type of inte | As es: raction (for ex any service) onflict of interprocedure | set cample, provision ces) rest in the tender or have been app |



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| I nereby confirm that all the information provided in the application is complete, it differ and remade. |
|--|
| Full name, position, department |
| |
| |
| Signature: |
| BURM ¹ ("Reviewed"): |
| |
| (Full name, position, Signature) |



Policy

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Annex 4

FAMILIARIZATION SHEET

with the Policy of Resolving Conflicts of Interest among Employees and Officials of NMSK Kazmortransflot LLP and its subsidiaries

| EMPLOYEES OF NMSK Kazmortransflot 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, | SIGNATURE | | |
| NAME OF THE DIVISION | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Responsible person ("Agreed"): | | | |
| (Full name, position, Signature) | | | |