

<b>NAC Kazatomprom JSC</b>	<b>CS</b>	<b>Compliance</b>
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## **Confidential Reporting Policy of NAC Kazatomprom JSC**

### **1. Purpose**

1.1. This Confidential Reporting Policy (“the Policy”) determines the order of submission of allegations (statements, complaints) about infringements, their review, adoption of measures based on the results of their review, and also establish measures to support employees of the Company and /or its subsidiaries and dependent companies as well as associated persons when alleging about infringements in the Company and / or its subsidiaries and affiliated organizations.

1.2. This Policy does not apply in case of considering of applications of persons and legal entities in accordance with the Administrative Procedural and Processing Code of the Republic of Kazakhstan.

1.3. The Company strives towards the best standards of corporate governance, transparency and accountability, and therefore seeks to ensure compliance with applicable regulatory requirements.

1.4. Any violation and, in particular, failure to comply with the Code of Ethics and Compliance, can cause significant damage to the Company's business and goodwill. The Policy is aimed at managing risks related to violations of principles and standards of conduct as well as in order to ensure compliance with the requirements of applicable anticorruption legislation.

1.5. Usually, persons who are the first to become aware of alleged violations are employees of the group of companies of the NAC Kazatomprom JSC (hereinafter – the Group). However, many employees may conclude that communicating their concern about violations to a manager of department or to the management of the entities of the Group is unacceptable for various reasons, i.e. employees may find that the issue of their concern is not serious enough or that reporting a concern will be seen as a disloyal attitude of such an employee to the Group, or that it would be easier to ignore this issue. In this regard, the Company's management provides employees and other Associated Persons disclosing violations with guarantees of confidentiality and protection from harassment, including job preservation. At the same time, employees who act in bad faith or make accusations for personal gain and/or with malice may face sanctions provided by relevant legislation and internal regulations of the Group.

### **1. Scope**

This Policy applies to all employees of the Company and its subsidiaries of the Company where the Company is a sole shareholder, and also applies when considering applications of subsidiaries and affiliates’ employees where the Company holds less than 100% stake and Associated Persons and Third parties.

### **2. Terms and definitions**

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1.		Head of Compliance Sarbasov S.M.	Resolution of the Board of Directors of NAC Kazatomprom JSC # 9/21 dated 25 August 2021

3.1. In this Policy, the terms and definitions below have the following meanings:

1) **Anticorruption Legislation** – legislation on preventing corruption, including the Criminal Code of the Republic of Kazakhstan, the Code of the Republic of Kazakhstan on Administrative Offenses, the Law of the Republic of Kazakhstan "On Preventing Corruption", UK Bribery Act and other applicable anticorruption legislation;

2) **Associated Persons** – members of the Board of Directors, the Management Board, employees, agents, joint venture partners, subsidiaries and affiliates and other persons providing services to the Group or acting on behalf of them;

3) **SUBS** – subsidiaries and affiliates of the Company;

4) **Audit Committee** – Audit Committee under the Board of Directors of NAC Kazatomprom JSC;

5) **Management Board** – collective executive body of NAC Kazatomprom JSC;

6) **Allegation** – information received through designated communications channels mentioned in clause 5.2.2 of this Policy as well as through other ways described in the Policy;

7) **Author of the Allegation** – employee of the Group, other Associate or Third party;

8) **Subject of the Allegation** – an employee of NAC Kazatomprom JSC, SUBS, a member of the Board of Directors or the Supervisory Board of a SUBS, in relation to whom the Allegation has been filed;

9) **Third party** – customers, suppliers, consumers, contractors, subcontractors, intermediaries and other third party entities as well as individuals;

10) **Disciplinary penalties** – penalties and sanctions as provided by the Labour Code of the Republic of Kazakhstan;

11) **Company's Competent Person** – head of compliance, and when absent (on business trip, vacation, temporary incapacity) – acting head of compliance;

12) **External Independent Operator ("hotline")** - an external independent entity responsible for confidential reporting, which receives Allegations about potential, committed or in-progress violations of the anticorruption legislation of the Republic of Kazakhstan, regulatory requirements, as well as about other issues provided for in this Policy. The hotline is accessible 24 hours a day, without days off, and is supported in the national, Russian and English languages. When contacting the hotline, an employee or an Associate must indicate the language that he or she would like to use.

#### 4. General provisions

4.1. This Policy provides guidance for the Group's employees and other Associated Parties/Third parties as to how to report violations across the Group, whether committed or being committed.

4.2. Types of offences covered by this Policy are as shown below:

<p><b>a) Bribery and corruption:</b></p> <ul style="list-style-type: none"> <li>- Giving a bribe;</li> <li>- Receiving a bribe;</li> <li>- Illegal fees;</li> <li>- Fraud;</li> <li>- Criminal conspiracy;</li> <li>- Coercion;</li> <li>- Abuse of authorities.</li> </ul>	<p><b>b) Accounting violations:</b></p> <ul style="list-style-type: none"> <li>- Errors in accounting;</li> <li>- Misrepresentations in accounting;</li> <li>- Financial omissions;</li> <li>- Falsification of records and documents.</li> </ul>
<p><b>c) Unequal conditions of recruitment and labour:</b></p> <ul style="list-style-type: none"> <li>- Discrimination;</li> </ul>	<p><b>d) Threat to health, safety and environment:</b></p> <ul style="list-style-type: none"> <li>- Harm to environment;</li> <li>- Damage to property;</li> </ul>

<ul style="list-style-type: none"> <li>- Labour conflicts;</li> <li>- Sexual harassment;</li> <li>- Unethical behaviour.</li> </ul>	<ul style="list-style-type: none"> <li>- Unsafe working conditions;</li> <li>- Theft;</li> <li>- Harm to health.</li> </ul>
<p><b>e) Leak of information:</b></p> <ul style="list-style-type: none"> <li>- Unauthorized disclosure of confidential and inside information.</li> </ul>	<p><b>f) Breach of procurement procedures:</b></p> <ul style="list-style-type: none"> <li>- Incompliance with provisions of internal regulatory documents in procurement at SUBS;</li> <li>- Incompliance with provisions of internal regulatory documents in procurement at the Company.</li> </ul>

## 5. Alleging procedure

5.1. Should they become aware of non-compliance with the Anticorruption Legislation, regulatory requirements and/or internal procedures, employees and Associated Parties/Third parties must report this as soon as possible in the manner prescribed in clause 5.2. of this Policy. Employees and other Associated Parties/Third parties must ensure that the disclosure is reliable, and such disclosure is in good faith. However, an employee or an Associate/Third party is not required to investigate cases of non-compliance with the Anticorruption Legislation, regulatory requirements and/or internal procedures.

5.2. Employees and Associated Parties/Third parties may choose to report their concerns about a potential violation, including on a confidential basis.

### *5.2.1 Procedure for reporting on a non-confidential basis:*

#### **Employees may choose to contact their direct supervisor**

In this case, the information is delivered either at a personal meeting or in writing. If the information is reported in writing, it is preferable to state the background and chronology of the issue of concern to the employee and indicate the reasons for such concern.

#### **Employees may choose to contact a superior manager**

If an issue of concern relates to their immediate supervisor or if the employee prefers not to discuss this issue with his/her immediate supervisor, such employee can report directly to a superior manager. It would also be preferable that the issue and the causes of concern be clearly stated in writing.

The direct managers and a superior manager:

- Receive Allegations about potential violations;
- Ensure the awareness of their employees on this Policy and the established procedure;
- Encourage an open working environment for staff who can easily express concerns;
- Consider each issue submitted in accordance with this Policy, as appropriate;
- Consider providing recommendations to the person expressing concern, or deal with the matter personally;
- Consider the need for an investigation;
- Resolve concerns, if possible;
- If it is impossible to resolve this issue at their levels, forward it to the Compliance Service.

#### **Employees and Associated Parties may contact Ombudsman**

If an issue of concern relates to discrimination, labour conflicts, sexual harassment, unethical behaviour, employees and Associated Parties may report this either orally or in writing to the Company's Ombudsman.

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The Ombudsman:

- Receives Allegations about potential violations;
- Examines each issue submitted in accordance with this Policy as appropriate;
- Considers the possibility of providing recommendations to a person expressing the concern, or deals with this matter personally;
- Resolves the concern, if possible;
- If this question can not be resolved at his/her level, forwards it to the Compliance Service.

**Employees and other Associated Parties / Third Parties may contact the Compliance Service**

Besides communicating their concern to the direct supervisor, a superior manager, the Ombudsman, or if an Employee prefers not to discuss the issue of concern, such Employee may contact the Compliance Service.

All other Associated Parties / Third parties may report violations – whether potential, committed or being committed – of the Anticorruption Legislation, regulatory requirements and/or internal procedures to the Compliance Service.

*5.2.2 Procedure for reporting on a confidential basis:*

Employees and Associated Parties/Third parties may contact the External Independent Operator on a confidential and anonymous basis. The up-to-date contact details of the External Independent Operator shall be placed at the corporate website of the Company.

The Company admits that Employees and Associated Parties may experience difficulties reporting violations, whether committed or being committed by their colleagues.

In this regard, and in order to comply with the Anticorruption Legislation, the Company shall provide employees and Associated Parties/Third parties with an ability to report violations to the External Independent Operator in a confidential manner, and also, if a person wishes to remain anonymous – with a guarantee of anonymity. At the same time, the External Independent Operator must encourage the Author of the allegation to disclose feedback contacts to the External Independent Operator, which is necessary solely for the purpose of information about the results or inquiry of additional information, or clarification of specific details from the Author of the allegation.

The refusal of the Author of the allegation to disclose the feedback details shall not be the basis for rejection of the Allegation.

In case of desire of the Author of the allegation to remain anonymous, the right of such an inquiry or clarification shall be solely within the External Independent Operator. The Compliance Service of the Company, other staff of the Company and/or SUBS (including members of working groups or other bodies created for carry out of investigations) shall be prohibited to address the Author of the allegation, even if they become aware of the personality of the Author of the allegation or his/her contact details.

The Company encourages its employees and Associated Parties/Third parties to disclose their names, and contact details in order to assist in further investigation and keep the Authors be informed of the progress.

The External Independent Operator shall transmit all Allegations to a Competent Person in a confidential manner, and also, if a person wishes to remain anonymous – on the basis of anonymity.

**6. Allegers protection guarantee**

Employees and other Associated Parties reporting violations in accordance with this Policy, will not be subject to any negative treatment or punishment in any way. Employees are given full protection of their rights and interests, including retaining their job position. However, an employee

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who does not act in good faith or makes an allegation for the purposes of personal gain and/or acts with malice may be subject to liability as stipulated by the laws of the Republic of Kazakhstan and internal regulations.

## **7. Procedure for reviewing Allegations**

7.1. Allegations of circumstances that may lead to criminal liability, shall not be considered by the Company. A person who indicates credible concern must be advised of the need to contact authorized state bodies. Where it is not feasible to advise a person of the need to contact authorized state bodies, information shall be communicated to the Company's Department for Physical Nuclear Security for further consideration and to be then directed to authorized state bodies.

7.2. Allegations received by the Compliance Service and through the External Independent Operator must be registered in the logbook by the Company's Competent Person.

7.3. The registration logbook shall include a serial number; date of receipt; author (if any); person; brief information on a violation; the status of the Allegation (considered, under consideration, or rejected).

7.4. Allegations shall be reviewed by the Competent Person as they are received. The Competent Person shall initially process the Allegation to determine the type of violation in accordance with paragraph 4.2. of this Policy, and to decide on the need for an investigation.

7.5. An Allegation shall be rejected in the following cases:

1) if there is no data on the Subject of the Allegations (it is not possible to classify the target based on information in the Allegations);

2) if the substance of a violation has not been revealed or a violation is not in the scope of this Policy;

3) if the Allegation has been simultaneously addressed to several authorities, including the Company / the Company's management / state bodies. Such Allegations shall be considered under the Administrative Procedural-Processual Code of the Republic of Kazakhstan;

4) if the Company does not have experts to conduct official investigation, and it is not possible to engage external experts.

7.6. When making a decision on whether to conduct an investigation, the Competent Person shall designate the responsible division (person in charge) in accordance with the allocation of topics of Allegations among responsible divisions (Annex 1 to this Policy) or, if necessary, shall recommend a subdivision in charge to set up a working group to conduct an investigation. The decision of the Competent Person shall be binding on all subdivisions and employees of the Company.

7.7. Before conducting an investigation, the responsible division (person in charge) or an investigative working group shall additionally collect requisite information and formulate an investigation plan. In doing this, it is necessary to limit – as much as possible – the scope of persons who become aware of the incoming Allegation and the progress of an investigation. The investigation shall be conducted within 15 (fifteen) calendar days. In case of a need for undertaking additional review or audits, the deadline of the investigation shall extend for not more than 30 (thirty) calendar days.

7.8. Based on the results of the investigation, the responsible division (person in charge) or an investigative working group shall draw up and sign an investigation report containing a detailed description of the findings with references to supporting evidence. The form of the report is provided in Annex 2 to this Policy. The report shall be submitted to the Competent Person within a reasonable period of time.

7.9. Based on the results of the investigation, the responsible division (person in charge) shall notify the Author of the Allegation about investigation results and measures taken, with due regard to confidentiality and data protection. If it is an anonymous Allegation, investigation results shall be

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communicated to the Competent Person, who submits the information to an External Independent Operator.

7.10. The Board of Directors defines the information related to incoming Allegations, the results of the investigation and the measures taken as very sensitive and confidential information. It is prohibited to discuss the Allegations, investigation results and the measures taken in public areas (lifts, cafes, dining halls, etc.). Persons guilty of unlawful disclosure related to the incoming Allegations, the investigation results and the measures taken will face the sanctions provided for by the applicable law and internal regulations of the Company.

## **8. Reporting**

The Competent Person must report to the Audit Committee / Board of Directors each quarter on the status of investigations on reports received by the Compliance Service and the External Independent Operator. The information shall at least contain:

- quantity of Allegations received (all Allegations received by the Compliance Service and the External Independent Operator);
- quantity of relevant Allegations (Allegations admitted into investigation or those Allegations for which there are specific facts or preliminary information), on which investigations were undertaken;
- information on whether an Allegation has been confirmed or not (in case of partial confirmation (if part of the reports has been confirmed), it is necessary to indicate what has been confirmed);
- information on what measures have been taken in relation to the Subject of the Allegation (employment contract terminated, sanctions applied, information sent to law-enforcement authorities, etc.);
- business area in which a violation has been perpetrated (procurement, labour conflicts, conflict of interest, corruption, fraud, etc.).

8.2. Upon request, report on the status of the incoming Allegations must be sent to the Compliance Service of Samruk-Kazyna JSC.

## **9. Monitoring and training**

9.1. The Company welcomes employees who are ready for an open discussion of this Policy, and has a positive attitude towards any constructive proposals on how to enhance it.

9.2. The Board of Directors shall revisit the requirements of this Policy on a regular basis (as necessary or once in two years) in order to update and improve it and, if necessary, shall amend the Policy, taking into account the proposals and recommendations of the Audit Committee.

9.3. The provisions of this Policy must be clear and accessible for each employee. All new employees shall be obliged to receive training on this Policy at the induction course.

9.4. In order to raise awareness of the hotline among employees and Associated Parties, the Competent Person shall distribute material to a mailing list by corporate email, place posters and banners at the Company's office, and post information on the website and with a corporate newspaper, etc.

## **10. Retention of information**

Information on received Allegations, results of investigations and other information referring to this Policy, shall be retained in Compliance Service for at least 5 years.

## **11. Annexes**

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11.1. Annex 1. Allocation of topics of investigations among divisions.

11.2. Annex 2. Reporting form about undertaken investigation on received allegation.

**Annex 1**  
**to Confidential Reporting Policy of NAC Kazatomprom JSC**  
(mandatory)

**Allocation of topics of investigations among divisions**

Chart 1 – Allocation of topics of investigations among divisions

<b>Type of violation</b>	<b>Responsible structural division of the Company</b>
<b>Bribery and corruption</b>	
Giving a bribe	Department for Physical Nuclear Security
Receiving a bribe	Department for Physical Nuclear Security
Illegal fees	Department for Physical Nuclear Security
Fraud	Department for Physical Nuclear Security / Control-Revision Department
Criminal conspiracy	Department for Physical Nuclear Security
Coercion	Department for Physical Nuclear Security
Abuse of authorities	Department for Physical Nuclear Security
<b>Accounting violations</b>	
Errors in accounting	Internal Audit Service
Misrepresentations in accounting	Internal Audit Service
Financial omissions	Internal Audit Service
Falsification of records and documents	Internal Audit Service
<b>Threat to health, safety and environment</b>	
Harm to environment	Health and Safety Department
Damage to property	Department for Physical Nuclear Security / Control-Revision Department
Unsafe working conditions	Health and Safety Department
Theft	Department for Physical Nuclear Security / Control-Revision Department
Harm to health	Health and Safety Department



*Continuation of chart 1*

<b>Type of violation</b>	<b>Responsible structural division of the Company</b>
<b>Unequal conditions of recruitment and labour</b>	
Discrimination	Ombudsman
Labour conflicts	Human Resources Department
Sexual harassment	Ombudsman
Unethical behaviour	Ombudsman
<b>Leak of information</b>	
Unauthorized disclosure of confidential and inside information	Data Protection Department / Compliance Service
<b>Breach of procurement procedures</b>	
Incompliance with provisions of internal regulatory documents in procurement at SUBS	Procurement Department
Incompliance with provisions of internal regulatory documents in procurement at the Company	Compliance Service / Department for Physical Nuclear Security

**Annex 2**  
**to Confidential Reporting Policy of NAC Kazatomprom JSC**  
(mandatory)

**Reporting form about undertaken investigation on received allegation**

**REPORT**  
**ABOUT UNDERTAKEN INVESTIGATION**  
**ON RECEIVED ALLEGATION # \_\_\_\_\_**

Type of offense (legal, accounting, ethical, etc.)	
Author of the allegation	
Name (Company/ SUB)	
Subject of the allegation	
Problem	
Conclusions upon results of the investigation	
Responsible division / department which undertook the investigation	

*Signatures:*

*Head of the responsible division*

*The report is accompanied with:*

- 1) Documents relevant for the allegation;*
- 2) Documents supporting the conclusions of the report;*
- 3) Recommendations / adjusting plan (if the audit findings have signs of a criminal offense, for further resolution on delivering the investigation materials to the authorized state bodies in accordance with the laws of the Republic of Kazakhstan).*