



KAZATOMPROM

NATIONAL ATOMIC COMPANY

**Report on compliance with principles and provisions
of Kazatomprom's 2023 Corporate Governance Code**

**February 2024
(Astana)**

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Introduction

The Corporate Governance Code (hereinafter referred to as the “Code”) for legal entities with more than fifty percent of voting shares (participation interests) owned by the Fund was approved by the decision of the Management Board of National Welfare Fund “Samruk-Kazyna” JSC (hereinafter referred to as the “Fund”), Minutes No. 22/15 dated 27 May 2015 as a mandatory corporate standard.

The goals of the Code are to improve corporate governance in the Fund and organizations, ensure the governance transparency and confirm the commitment of the Fund and organizations to follow the standards of good corporate governance.

The Code was developed in accordance with the legislation of the Republic of Kazakhstan, internal documents of the Fund, taking into account the corporate governance practice developing in Kazakhstan and the world. The provisions of the Code are applied taking into account the specifics provided for by the legislation of the Republic of Kazakhstan

The Fund and organizations must comply with the provisions of the Code, and in case of non-compliance, specify in the annual report the reasons for non-compliance with each of the provisions. The Board of Directors may, for individual reasons, conclude that certain provisions of the Code are inapplicable or impossible to comply with. Control over the implementation of the Code by the Fund and organizations is assigned to the boards of directors of the Fund and organizations, respectively. Corporate secretaries monitor and advise the boards of directors and the executive body of the Fund and organizations on issues of proper compliance with the Code, and also prepare a report on compliance/non-compliance with its principles and provisions on an annual basis. Subsequently, this report is submitted for consideration to the relevant Committees of the Board of Directors, approved by the Board of Directors and included in the annual report of the Fund or organization.

Cases of non-compliance with the provisions of the Code should be carefully considered at meetings of the relevant committees and boards of directors with the adoption of respective decisions aimed at further improving corporate governance in the Fund and organizations.

In accordance with paragraph 15 of Chapter 5 of the Code, the Corporate Secretary Service has prepared this Report on compliance with its principles and provisions. NAC Kazatomprom JSC (hereinafter referred to as the “Company”) is also working to improve the corporate governance system in accordance with the approved action plan, drawn up on the basis of conclusions and recommendations based on the results of the annual assessment of the Company’s corporate governance rating, carried out in accordance with the methodology approved by the Fund, and also in accordance with the recommendation of an independent PwC consultant to bring the level of corporate governance into line for the Company to carry out an IPO.

The report format has the same structure and level of detail as the Code. The report is presented in a table format that includes seven sections (similar to the Code), each of which has the following structure:

- provisions of the Corporate Governance Code;
- a description of the current situation in the Company in relation to the relevant provision of the Code;
- level of compliance (“complied” / “partially complied” / “not complied with” / “not applicable”);

The monitoring included the following main steps:

- 1) Collection of available information of the Company.
- 2) Filling out the report format by persons responsible for conducting Gap analysis in various areas, based on an analysis of internal documents and materials of the Company and information obtained during interviews.
- 3) Consolidation of the report on monitoring results for consideration by the Audit Committee of the Board of Directors and approval by the Board of Directors, with subsequent inclusion of the report’s conclusion into the Company’s annual report for a wide range of stakeholders.

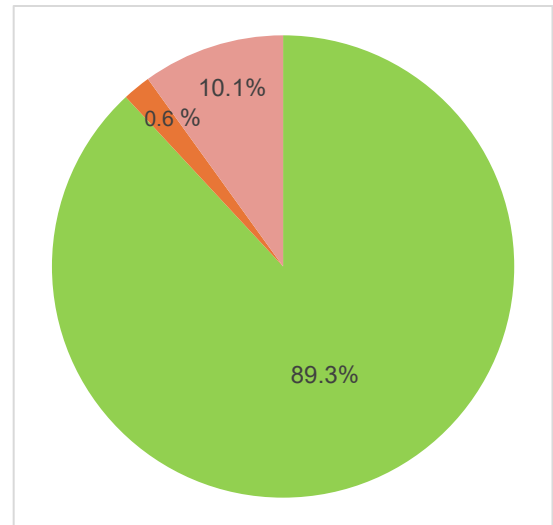
Below are the main conclusions in the context of each individual section of the Code.

Note: The report on compliance with the principles and provisions of the Code is not linked to the report on the assessment of the corporate governance rating carried out in the Company on an annual basis, since the diagnosis and assessment of the corporate governance rating is carried out according to the methodology approved by the Fund, developed by an independent consultant. In turn, the presented report was prepared on the basis of an analysis of compliance/non-compliance with the principles and provisions of the Code only.

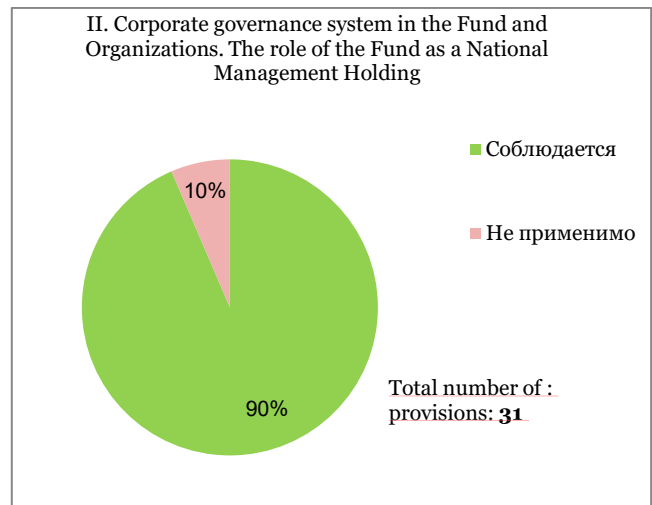
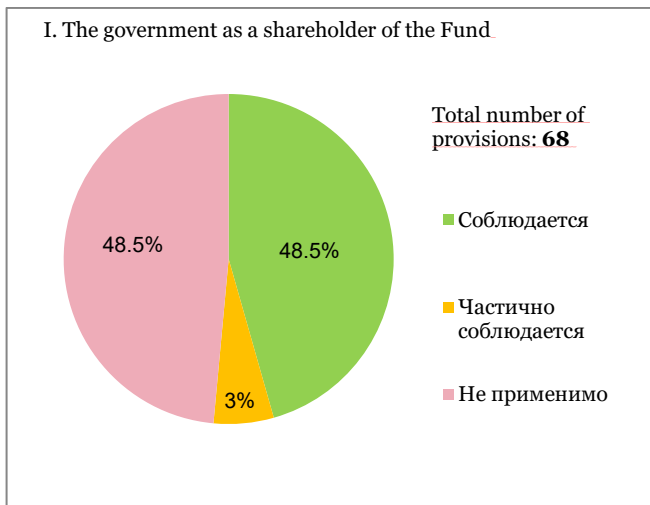
Main conclusions

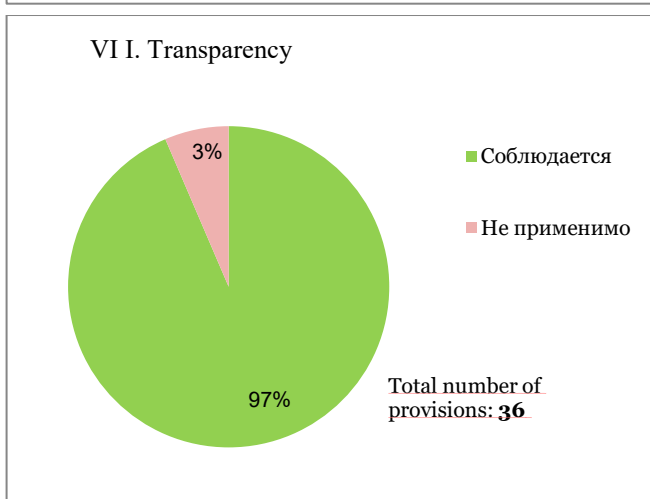
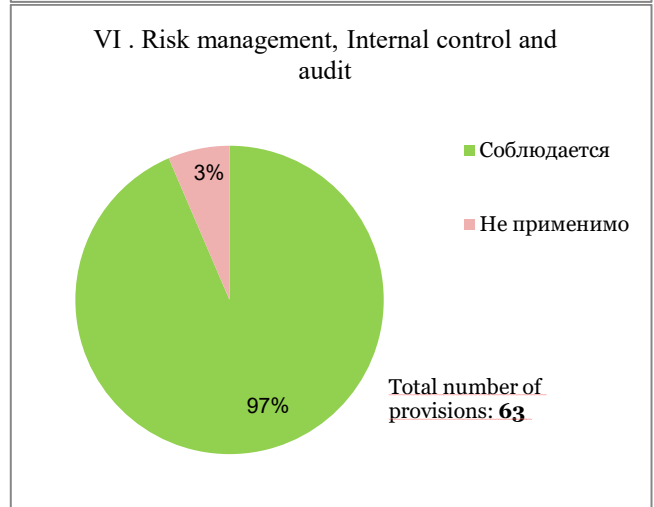
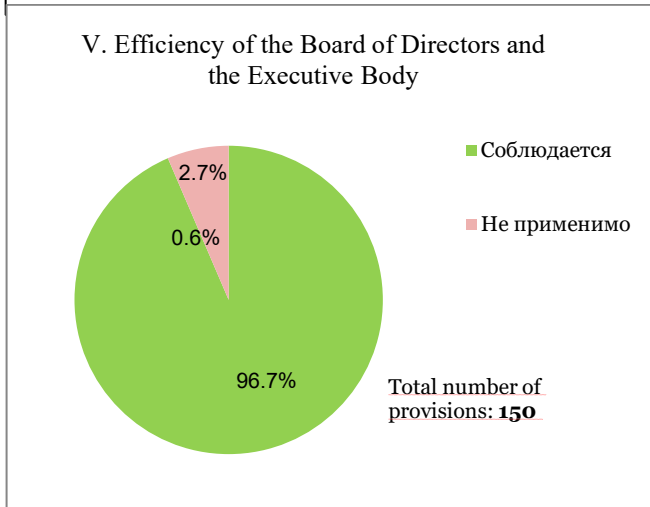
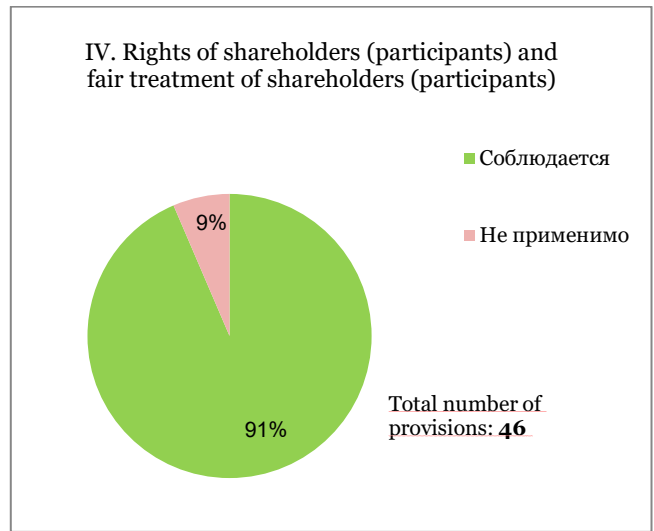
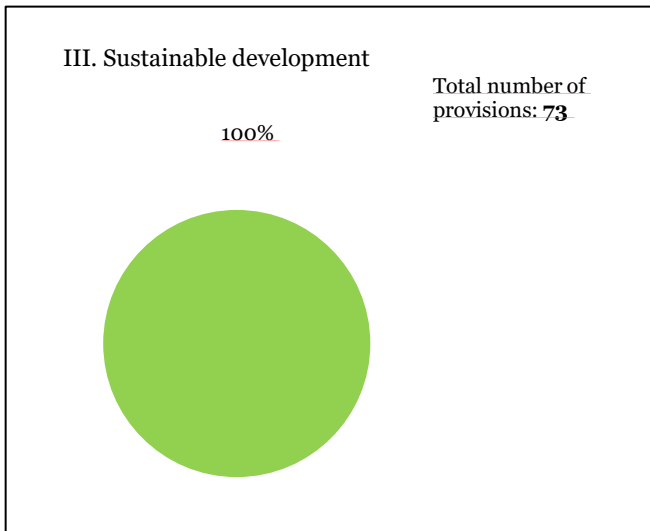
According to the results of the analysis, in practice, the Company complies with 89.3% of the Code provisions, another 0.6% of the Code provisions are partially complied with (with explanations of the reasons) and there are no non-complied provisions. With that, 10.1% of the provisions of the Code are not applicable to the Company.

	Company assessment, %	Number of provisions
Complied with	89.3%	417
Partially complied with	0.6%	3
Not complied	0%	0
Not applicable	10.1%	47
Total number of provisions of the Code		467



The main results of the analysis of compliance of the Company’s practices with the Code provisions:

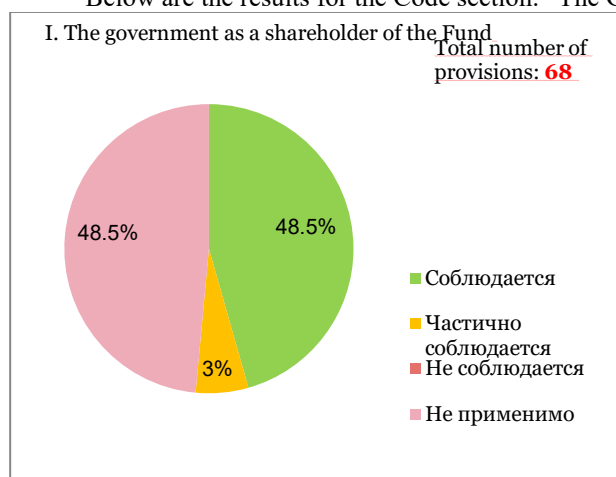




Further, the Report presents a detailed analysis of the compliance of the existing corporate governance practices in the Company with the provisions of the Code.

I. Government as a shareholder of the Fund

Below are the results for the Code section: “The Government as a Shareholder of the Fund.”



Based on the results of the analysis, the current practice of Company’s corporate governance on this section is 48.5% compliant with the requirements of the Code, 48.5% - 33 provisions of the chapter are not applicable to the Company as they relate to the activities of the Fund, 3% partially complies with the requirements of the Code.

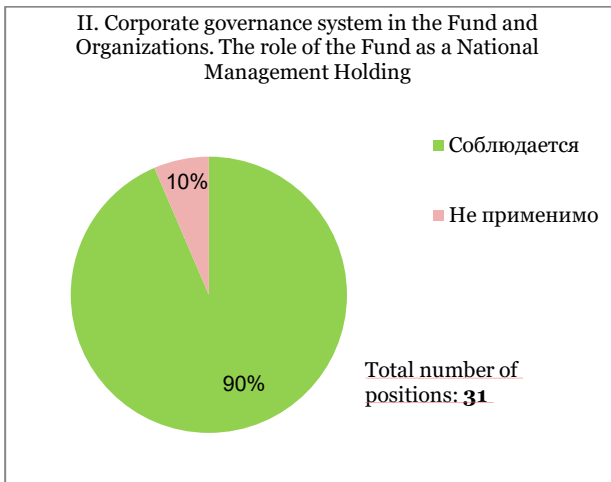
#	Key areas of compliance of the Company with the Code requirements
E 1.	On 8 February 2018, the Board of Directors of the Company (hereinafter also referred to as the “Board of Directors”) approved the updated Company’s 2018-2028 Development Strategy. The Board of Directors annually reviews the results of achieving the indicators of the Development Strategy. The Company’s management makes decisions within its competence in accordance with the procedure established by the legislation of the Republic of Kazakhstan, the charter and internal documents of the Company.
2 2.	The main strategic objective of the Company is the growth of long-term value and sustainable development. Based on the strategic goals and objectives defined in the development strategy, Business plans are developed for five-year periods. Bodies, officials and employees of the Company and organizations operate and make decisions in accordance with the development strategy and charter.
3 3.	The relationship between the Company and shareholders is determined by the Company’s Charter, the Law of the Republic of Kazakhstan “On Joint Stock Companies”, and the Law of the Republic of Kazakhstan “On the National Welfare Fund”. The Company’s Charter defines its bodies and their competencies: the General Meeting of Shareholders, the Board of Directors, the Management Board, the Internal Audit Service (hereinafter referred to as the “IAS”), they are also listed in the regulations on the relevant bodies (Regulations on the General Meeting of Shareholders, Regulations on the Board of Directors, Regulations on the Management Board, Regulations on the Company’s IAS, etc.).
4 4.	Kazatomprom’s Code of Ethics and Compliance (hereinafter referred to as the “CEC”) in a new edition was approved in 2022, by the decision of the Company’s Board of Directors dated 24 November 2022 (Minutes No. 13/22). The Company has mechanisms aimed at collecting information about violations of the CEC and Company policies. In 2022, the Policy of NAC Kazatomprom JSC on combating corruption and fraud was updated (approved by the decision of the Board of Directors of the Company dated 21 June 2022 (Minutes No. 5/22)). In accordance with the Confidential Informing Policy of NAC Kazatomprom JSC (approved by the decision of the Company’s Board of Directors dated 25 August 2021 (Minutes No. 9/21), the Company also considers messages received through the hotline and the email address indicated on the web site of the Company. The existing mechanism allows one to report directly to the Audit Committee regarding violations of corporate ethics. The provisions of the CEC apply to employees and officials of the Company and are mandatory for compliance. The Company ensures that all employees and officials are familiar with the CEC (familiarization sheets are signed), and also annually tests Company employees for knowledge of and compliance with the CEC. In order to comply with the provisions of the CEC, the Board of Directors on a quarterly basis hears reports on the consideration of messages received via the hotline, and also, as part of the approval of the Integrated Annual Report, considers the section on compliance with the CEC requirements.

4
5. The Company has ensured the presence of an Ombudsman, whose responsibilities include explaining the provisions of the CEC and organizing consideration of all situations related to violations of business ethics, legislation or Company policies. The Ombudsman is independent and has a sufficiently high status and level of accountability to bring any issues in the field of business ethics, compliance with Company policies or legislation to the level of management and the Board of Directors of the Company.

#	<i>Areas of non-compliance with the key Code requirements</i>	<i>Explanations and Measures for Implementation</i>
E 1.	The Fund and companies must have an optimal asset structure. The fund and companies should strive to simplify as much as possible the structure of their assets and their organizational and legal forms	<p>According to the Code, a holding company (Kazatomprom) can be established in the form of a joint stock company. It is recommended that other entities within the same group be formed as limited liability partnerships. It is recommended to consider converting already established joint stock companies into limited liability partnerships.</p> <p>As of December 31, 2023, the group included 36 subsidiaries and affiliates, 30 subsidiaries and affiliates of the 2nd level, 6 subsidiaries and affiliates of the 3rd level. Of the 30 2nd level subsidiaries and affiliates 21 LLPs and 4 JSCs are in the Republic of Kazakhstan, 3 JSCs are in the Russian Federation and Ukraine, and there are 2 other foreign companies. Of the 6 3rd level subsidiaries and affiliates 4 LLPs are in the Republic of Kazakhstan, 1 company is in China, 1 company is in the Russian Federation.</p> <p>Of the 30 2nd level subsidiaries and affiliates - 100% in the group (voting) - 8 companies (including 1 foreign one), 50% or more in the group - 12 companies (including 1 foreign one), outside the group (5-50%) – 9 companies, 0-5% – 1 company. Of 6 3rd level subsidiaries and affiliates there are 4 companies in the group (including 1 foreign one), outside the group (5-50%) - 1 company, 0-5% - 1 company (Russian Federation).</p> <p>Currently, as part of the business transformation and asset restructuring program, the Company is working to set aside its core activities, simplify the asset structure, and exit areas of activity in order to avoid competition with private business in the Republic of Kazakhstan. At the same time, the Company systematically carries out work on the sale of non-core assets.</p> <p>Based on the results of the analysis of risks and economic effect, subject to the adoption of all necessary decisions by the authorized bodies of the Company, it is possible to conduct negotiations with other shareholders of subsidiaries and affiliates in the organizational and legal form of JSC for reorganization into a LLP. In this case, these measures will also have to be provided for in the Restructuring Plan for the medium term.</p>
3 2.	It is recommended to have and maintain a controlling stake in the Fund's organizations	<p>Of the 36 subsidiaries and affiliates of the Company, 6 are joint stock companies (JSC), in which the number of voting shares owned by the Company ranges from 10% to 100% (another 2 JSCs in the Russian Federation - less than 1% of shares). 25 are limited liability partnerships (LLPs) with participation shares from 5% to 100%, 3 are foreign companies.</p> <p>It is possible to conduct negotiations with other participants in the Company's subsidiaries and affiliates on the acquisition of shares (participatory interests) for the purpose of owning a controlling stake/controlling interest. In this case, these measures will also have to be provided for in the Restructuring Plan for the medium term.</p>

#	<i>Conclusion: Potential negative impact on the Company regarding non-compliance with the key requirements of the Code</i>
1.	In general, it is worth noting that the Company needs to develop its own Corporate Governance Code taking into account the public status and specifics of the Company's activities. At the same time, the Corporate Governance Code of Samruk-Kazyna JSC, used in relation to the Company, may cause concern among minority shareholders.
2.	The absence of a controlling stake (participatory interest) in the Company's subsidiaries and affiliates, in particular in mining enterprises, entails the risk of loss of control over sales markets by production volumes, a decrease in the Company's share in the world market and, as a consequence, the possibility of influencing the price on the world market. There is also a risk of receiving dividends from subsidiaries and affiliates in an incomplete (planned) amount due to the lack of a unanimous decision at the authorized body of the subsidiaries and affiliates (GMP, GMS).

II. Corporate governance system in the Fund and Organizations. The role of the Fund as a National Management Holding

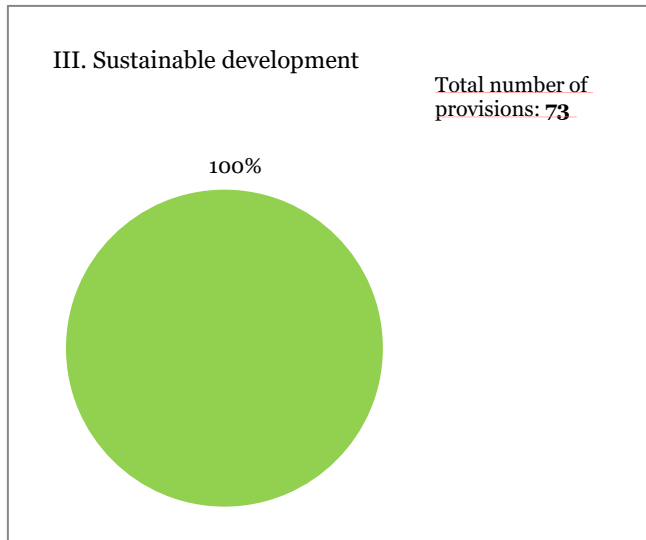


Below are the results of the analysis on the Code section: "Corporate governance system in the Fund and Organizations. The role of the Fund as a National Management Holding."

Based on the **results** of the analysis, the current practice of corporate governance in the Company under this section is 90% consistent with the requirements of the Code. 10% - 3 provisions of this chapter are not applicable to the Company, in connection with the IPO and, as a consequence, the Fund's loss of the status of the sole shareholder of the Company.

#	Key areas of the Company's compliance with the requirements of the Code
2 1.	The Company and its subsidiaries and affiliates have approved regulations on bodies and structural subdivisions, as well as job descriptions for the corresponding positions. Compliance with the provisions of these documents ensures systematic and consistent corporate governance processes.
32 .	The Fund participates in the management of the Company through the implementation of the functions of a shareholder (participant), as well as through the Board of Directors, in the manner prescribed by the Charter of the Company and the Code.
3.	The Board of Directors of the Company holds a meeting on a quarterly basis devoted to issues of execution of the Business Plan, performance indicators, and interested party transactions, the decision on which is made by the Management Board of the Company. The Board of Directors annually reviews the results of the implementation of the Strategy and Business Plan, which includes the budget, KPI, investment and financial plans.
4.	The Board of Directors of the Company is independent in making decisions within its competence established by the Charter of the Company.
#	Conclusion: Potential negative impact on the Company regarding non-compliance with key requirements of the Code
1	None.

III. Sustainable development



Below are the results of the analysis on the Code section: “Sustainable Development”.

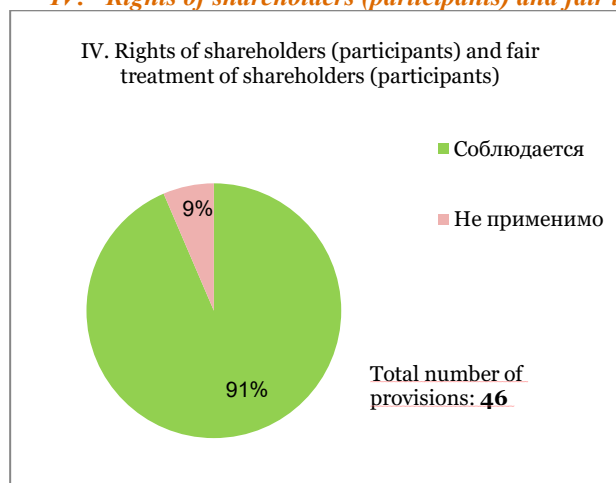
Based on the results of the analysis, the current practice of corporate governance in the Company under this section is 100% compliant with the requirements of the Code.

In particular, the Company complies with the following key requirements of the Code:

#	Key areas of the Company's compliance with the requirements of the Code
	The Stakeholder Map of NAC Kazatomprom JSC was approved by decision of the Management Board of NAC Kazatomprom JSC dated 18 March 2021 No. 10/21.
E 1.	The Board of Directors of the Company approved the Corporate Policy of NAC Kazatomprom JSC in the field of sustainable development (Minutes of the Board of Directors of NAC Kazatomprom JSC dated 20 February 2020 No. 1/20), which defines the basic principles and priorities in the field of stakeholder relations. The corporate policy of NAC Kazatomprom JSC in the field of sustainable development is consistent with the general corporate development strategy of the Company.
2.	The Company's Board of Directors holds a quarterly meeting dedicated to the implementation of the Company's Business Plan, and annually holds a meeting dedicated to the implementation of the development strategy, with the involvement of all stakeholders. When assessing the Company's performance results, the Board of Directors compares the Company with similar companies.
3.	The Anti-Corruption and Anti-Fraud Policy includes measures to inform stakeholders about the fight against corruption.
4.	The Company annually publishes an Annual Report (integrated annual report) in accordance with the requirements of GRI, SASB, TCFD standards, which includes a section on sustainable development.
5.	The Company has developed a Sustainable Development Program for 2023-2030, containing approaches, principles, goals and their implications in environmental, social and corporate governance. The implementation of the Program in 2023 and 2024 will be carried out in accordance with the Roadmap for improving ESG practices at NAC Kazatomprom JSC for 2023-2024 approved by the Board of Directors.
6.	The Company has a Code of Suppliers and Contractors, which defines the requirements for the Company's counterparties to comply with the principles of sustainable development.

#	Conclusion: Potential negative impact on the Company regarding non-compliance with key requirements of the Code
	None.

IV. Rights of shareholders (participants) and fair treatment of shareholders (participants)



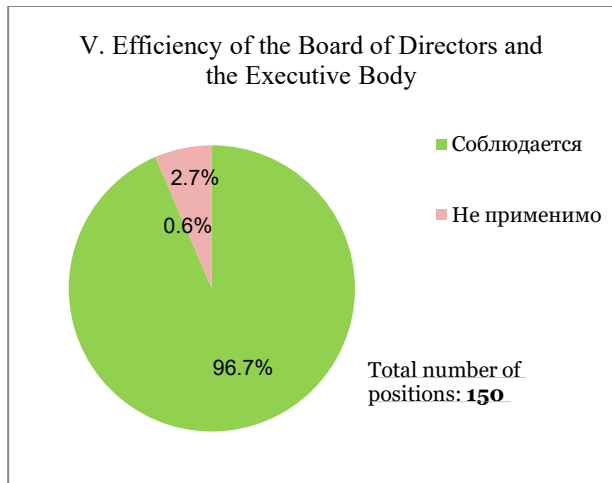
Below are the results of the analysis on the Code section: “Rights of shareholders (participants) and fair treatment of shareholders (participants).”

Based on the results of the analysis, the current practice of corporate governance in the Company under this section is 91% consistent with the requirements of the Code. 9% - 4 provisions of this chapter are not applicable to the Company, in connection with the IPO and, as a consequence, the Fund’s loss of the status of the sole shareholder of the Company. In particular, the Company complies with the following key requirements of the Code:

#	Key areas of the Company's compliance with the requirements of the Code
	Shareholders (participants) and investors receive information about the organization’s activities through:
	1) an annual report, including, among other things, a report of the Board of Directors and audited annual financial statements;
	2) the organization’s web site, containing a section for shareholders (participants) and investors, reflecting current information about the organization’s activities;
E 1.	3) the possibility of obtaining information and documents through sending requests to the organization in the manner established by the legislation of the Republic of Kazakhstan, the constituent and internal documents of the organization;
	4) press releases and other information materials distributed by the organization;
	5) briefings conducted by the organization;
	6) other methods in accordance with the internal documents of the organization.
2.	In order to effectively distribute the profits received, the organization has established a clear and transparent mechanism for determining the amount and payment of dividends (Dividend Policy of the Company).
3.	Dividends are paid within the period established by the decision of the general meeting of shareholders (sole shareholder).
4.	The Company has an IR Department, whose functions include maintaining communications with investors and ensuring timely and high-quality responses to shareholder questions.
5.	The materials of the General Meeting are published on the Company’s corporate web-site. Contact information for shareholders and investors is indicated in publications on convocation of the General Meeting of Shareholders, press releases, etc.
6.	By the decision of the annual General Meeting of Shareholders of the Company (Minutes No. 1) dated 27 May 2022, the Regulations on Kazatomprom General Meeting of Shareholders were approved, which regulate the procedure for holding the General Meeting of Shareholders.
7.	From the moment of its IPO and the Company's securities listing on international platforms, the Company has complied with the regulatory requirements of stock exchanges (LSE, AIX) for information disclosure, as well as the corporate governance standards of the UK Corporate Governance Code, including in terms of compliance with and protection of the interests of minority shareholders.
#	<i>Conclusion: Potential negative impact on the Company regarding non-compliance with key requirements of the Code</i>
	None.

V. Efficiency of the Board of Directors and the Executive Body

Below are the results of the analysis for the section of the Code: “Efficiency of the Board of Directors and the Executive Body.”



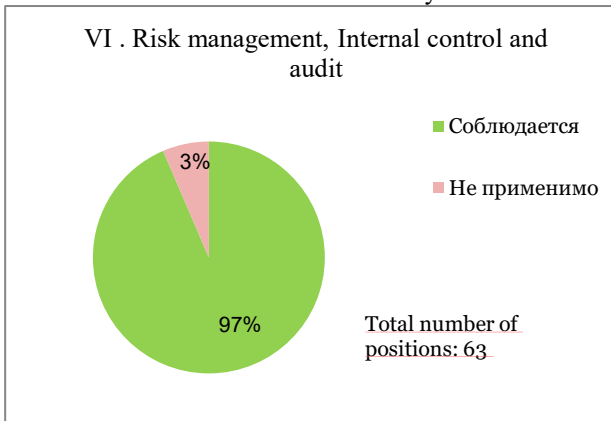
Based on the results of the analysis, the current practice of corporate governance in the Company under this section is 96.7% in compliance with the requirements of the Code. 2.7% - 4 provisions of this chapter are not applicable to the Company in connection with the IPO and, as a consequence, the Fund’s loss of the status of the sole shareholder of the Company. 0.6% - 1 provision of this chapter is partially complied with due to the lack of gender diversity in the composition of the Board of Directors. In particular, the Company complies with the following key requirements of the Code:

#	Key areas of the Company's compliance with the requirements of the Code
E	In accordance with the Regulations on the Board of Directors of NAC Kazatomprom JSC, members of the Board of Directors bear personal responsibility for fulfilling the duties of a member of the Board of Directors, including fiduciary duties to the shareholder (shareholders) and decisions made, the effectiveness of their activities, actions and/or inactions.
1.	The term of office of the Board of Directors does not exceed three years, with the right of subsequent re-election, which is clearly stated in the Company’s Charter, the Regulations on the Board of Directors and the Corporate Governance Code.
2.	The Board of Directors of the Company and its committees must maintain a balance of skills, experience and knowledge, ensuring the adoption of independent, objective and effective decisions in the interests of the organization and taking into account fair treatment of all shareholders and the principles of sustainable development.
3.	In organizations with several shareholders, the process of electing members of the Board of Directors and the Chairman of the Board of Directors is carried out in the manner prescribed by the Law of the Republic of Kazakhstan “On Joint Stock Companies” and the Charter of the organization. In these organizations, it is recommended that the Nomination and Remuneration Committee of the organization’s Board of Directors be involved in determining the composition, required skills and competencies of the Board of Directors and candidates for the Board of Directors.
44	The participation of members of the Government and officials of government bodies in the Board of Directors of the Company is not permitted.
5.	The performance of the Board of Directors, committees of the Board of Directors and each member of the Board of Directors is assessed annually and every 3 years with the involvement of an independent consultant. In the first quarter of 2023, an independent assessment of the activities of Kazatomprom Board of Directors for 2020-2022 was carried out.
6.	The Company has approved the Regulations on the settlement of corporate conflicts and conflicts of interest of NAC Kazatomprom JSC in a new edition (minutes No. 5/23 dated 25 May 2023), which defines the concept of a conflict of interest, a list of possible situations of conflict of interest, and establishes the procedure for resolving conflicts of interest among members of executive bodies and other employees of the company, which is implemented in practice.
7.	The Company approved the Rules for the formation of a succession plan for members of the Board of Directors of NAC Kazatomprom JSC by decision of the Board of Directors dated 4 December 2020 (Minutes No. 14/20).
8.	By decisions of the annual General Meeting of Shareholders of the Company dated 27 May 2022 (Minutes No. 1) and 25 May 2023 (Minutes No. 2), changes and additions to the Regulations on the Board of Directors of the Company and the Charter of the Company were approved, establishing the position of “Senior Independent Director” in the composition of Board of Directors of the Company.
9.	

#	<i>Areas of non-compliance with key Code requirements</i>	<i>Explanations and Measures for Implementation</i>
E 1.	The composition of the Board of Directors must ensure diversity in terms of experience, personal characteristics and gender composition. The Board of Directors must include independent directors in a number sufficient to ensure the independence of decisions made and fair treatment of all shareholders. The recommended number of independent directors on the Company's Board of Directors is up to fifty percent of the total number of members of the Board of Directors.	This provision is partially observed, since the requirement for gender diversity in the composition of the Board of Directors of the Company is not observed. In particular, from the beginning of the year until 21 June 2023, the Board of Directors included one woman – N. Nurbayeva (1/7), from 21 June 2023 until the end of the year, the composition of the Board of Directors consisted only of men (0/7). Clause 4.1. of the Roadmap for improving ESG practices at NAC Kazatomprom JSC for 2023-2024 provides for the item of increasing the share of women in the Board of Directors of the Company.
<i>Conclusion: Potential negative impact on the Company regarding non-compliance with key requirements of the Code</i>		
<p>The lack of gender diversity in the composition of the Board of Directors limits the effectiveness of the Board of Directors.</p> <p>Also, the issue of gender equality is included in the assessment methodology of the world's leading ESG rating agencies (S&P Global, Sustainalytics, Moody's, etc.). In 2023, compared to 2022, the Company demonstrated negative dynamics in terms of gender diversity of the Company's management bodies. This factor may have an impact on the reduction of the "Corporate Governance" component by S&P Global in the ESG assessment of the Company.</p>		

VI. Risk management, internal control and audit

Below are the results of the analysis on the Code section: “Risk Management, Internal Control and Audit”.



Based on the results of the analysis, the current practice of corporate governance in the Company under this section is 97% consistent with the requirements of the Code. In particular, the Company complies with the following key requirements of the Code:

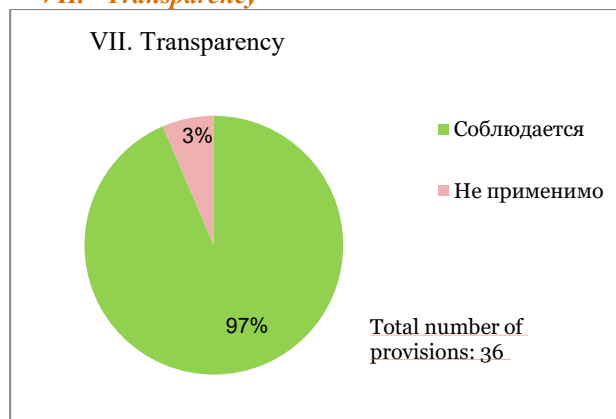
#	Key areas of the Company's compliance with the requirements of the Code
E 1.	<p>An effective risk management system is a fundamental element of the activities and development strategy of NAC Kazatomprom JSC. Accurate and timely identification, assessment, monitoring and response to risks allow making decisions at all levels of management and ensuring the achievement of strategic goals and key performance indicators of NAC Kazatomprom JSC. NAC Kazatomprom JSC has formed a structural subdivision responsible for organizing risk management activities, which carries out measures to organize the activities of the Company’s risk management system. At the Company's enterprises, separate structural subdivisions responsible for risk management and/or compliance functions have been formed, or risk managers and/or risk and compliance officers have been appointed.</p> <p>In order to periodically assess corruption risks in individual areas of the Company’s activities and the effectiveness of existing anti-corruption measures, as well as for the purpose of timely introduction of changes and additions to the Company’s anti-corruption policies and procedures in accordance with changes in anti-corruption norms and legislation of the Republic of Kazakhstan, the Compliance Service monitors corruption risks.</p>
2.	<p>The Management Board of the Company is responsible for organizing an effective RMS and ICS. The risk management process is based on interaction with the Company’s key business processes, such as: strategic planning, operational activities, investment activities, lending activities, budgeting, and personnel motivation.</p>
3.	<p>The Company approves qualitative and quantitative risk appetites, a register and a risk map. The risk register provides tolerance levels for key risks.</p> <p>Based on the assessment of corruption risks, a map and register of corruption risks is drawn up, an action plan is developed to minimize the identified risks, which are approved by the Board of Directors of the Company.</p>

4. All key risk issues submitted for consideration and approval to the Company's Board of Directors are preliminarily considered by the Audit Committee of the Company's Board of Directors. Only after all the comments and proposals of the Audit Committee have been processed, the document is submitted to the Board of Directors of the Company. All meetings of the Committee and the Board of Directors of the Company are recorded accordingly.
5. Employees and officials of the Company have the right to confidentially report to the Audit Committee/BoD through the Company's hotline the violations or incorrect fulfillment of risk management or internal control procedures, or other policies, as well as cases of fraud and violation of the legislation of the Republic of Kazakhstan.
6. The Regulations on the IAS provide for functional accountability to the Board of Directors. Functional accountability is ensured by the Board of Directors by approving the annual plan, budget, quantitative composition, and terms of remuneration of internal audit officers. The Regulations specify that the IAS must be free from interference by third parties in the process of determining the scope of internal audit, carrying out work and reporting on the results. The head of the IAS should provide information to the BoD if there are interventions and discuss the possible consequences.

Conclusion: Potential negative impact on the Company regarding non-compliance with key requirements of the Code

None.

VII. Transparency



Below are the results of the analysis on the Code section: “Transparency”.

Based on the results of the analysis, the current corporate governance practice in the Company under this section is 97% compliant with the requirements of the Code. However, one provision of the Code is not applicable to the Company. In general, the Company complies with the following key requirements of the Code:

#	Key areas of the Company's compliance with the requirements of the Code
1.	The Company has the Rules “Disclosure of information of NAC Kazatomprom JSC” approved by decision of the Board of Directors dated 21 June 2022 No. 5/22.
22	By decision of the Board of Directors dated 20 May 2021 No. 5/21 the Company approved the List of information constituting a trade secret of NAC Kazatomprom JSC and the List of information constituting confidential information of NAC Kazatomprom JSC, in a new edition, and each employee signs Obligation of non-disclosure of information constituting confidential information of NAC Kazatomprom JSC.
·	With regard to insider information, the Company has the Rules “Internal control over the disposal and use of insider information of NAC Kazatomprom JSC”, approved by the decision of the Board of Directors of the Company dated 21 June 2022 (Minutes No. 5/22). Confidentiality agreements are also concluded with the main recipients of insider information. The Compliance Service maintains constant records and monitoring of persons who have access to the Company's insider information.
3.	Securities of NAC Kazatomprom JSC are included in the listing of the London Stock Exchange (hereinafter – “LSE”), Astana International Exchange (hereinafter – “AIX”) and the Kazakhstan Stock Exchange (hereinafter – “KASE”). Reporting is published in accordance with the requirements of the above-mentioned exchanges. There is a separate section “Investors” on the Company’s corporate web site comprising the necessary information in accordance with the LSE, AIX and KASE Listing Rules and contact details of responsible persons.
4.	Disclosure of information in the media and posting of information on the corporate web site of NAC Kazatomprom JSC is regulated by the Rules of Disclosure of Information approved by the Board of Directors under No. 5/22 dated 21 June 2022. Appropriate information disclosure schedules have been drawn up taking into account the requirements of the exchanges on which the Company's shares are placed. The Company also has an Information Disclosure Policy of NAC Kazatomprom JSC, approved by decision of the Company’s Board of Directors dated 21 June 2022 No. 5/22.
4.	The Company prepares an annual report for a wide range of people (integrated annual report) in accordance with the provisions of the Code and best global practice.

5 5.	<p>The Company ensures that the annual financial statements are audited in accordance with the legislation of the Republic of Kazakhstan and the internal documents of the Company. The annual audit of financial statements is carried out through the involvement of an independent auditor - an international audit organization with a high level of qualification of specialists from the audit organization; experience in both the Kazakh and international markets; knowledge of the industry business; a positive reputation, both in the Kazakh and international markets, which, as a third party, provides an objective opinion to stakeholders about the reliability of financial reporting and its compliance with IFRS requirements.</p>
6 6.	<p>The selection of the Company's external auditor is carried out on the basis of a tender. The procedure for selecting an audit organization is carried out in accordance with the Rules for selecting an audit organization for Samruk-Kazyna JSC and organizations, where more than fifty percent of the voting shares (participatory interests) are directly or indirectly owned by Samruk-Kazyna JSC under the right of ownership or trust management, approved by the Decision of the Management Board of Samruk-Kazyna JSC dated 27 December 2016. Members of the Board of Directors' Audit Committee are members of the commission for selecting the external auditor and participate in the process of evaluating the results of the tender. Recommendations of the Audit Committee of the Board of Directors on the appointment and amount of payment for the services of an external auditor are presented to the Board of Directors and the General Meeting of Shareholders. The Audit Committee of the Board of Directors recommends the amount of payment, the timing of the audit and the choice of audit organization to the Board of Directors of the Company.</p> <p>The Company discloses the following on the corporate web site: the name of the audit organizations that provided financial reporting audit services; information on the amount of remuneration of the audit organization under the contract; "Policy in the field of attracting the services of audit organizations", approved by the decision of the Board of Directors dated 24 November 2022 (minutes No. 13/22), contains information on the determination of the audit organization, the rotation of key personnel of the audit organization, the approval of the services of the audit organization not related to the audit of financial statements and other information, and the hiring of former employees of the audit organization.</p> <p>The Company's audit is carried out by an audit organization that is not affiliated with it and its management. External auditor in 2014-2022 provided training and other services, without prejudice to the objectivity or independence of the auditor, the cost of which is not more than fifty (50)% of the average fees paid for the audit of the Group during the last three consecutive financial years. There are no cases of hiring the former members of the audit team earlier than 2 years after their dismissal from the audit organization on the management positions or positions involving significant influence on the financial reporting process. Partner rotation was carried out over a period of no more than 6 years in accordance with the approved "Policy in the field of attracting the services of audit organizations" and with the approval of the Audit Committee of the Board of Directors (Minutes No. 2/19 dated 18 February 2019).</p>

#	<p><i>Conclusion: Potential negative impact on the Company regarding non-compliance with key requirements of the Code</i></p>
1	None.