



**KAZATOMPROM**  
NATIONAL ATOMIC COMPANY

# CODE OF ETHICS AND COMPLIANCE OF NAC KAZATOMPROM JSC

pocket edition

# SPEECH OF CEO OF NAC KAZATOMPROM JSC

Dear Colleagues!

Today, as ever, NAC Kazatomprom JSC is challenged with extensive tasks. We are building a modern company; we are involved in the delivery of the most important state projects. The implementation of the new strategy will enable us to become a transnational company and a leading supplier of natural uranium in the world market, and to diversify production across all parts of the nuclear fuel cycle, as well as to build an effective marketing system and put together a professional team of like-minded people. One of the key conditions for handling these objectives is a continuous increase in the efficiency of our activities.

To accomplish these goals, NAC Kazatomprom JSC places a special focus on the development and improvement of the corporate culture, an important tool of which is this Code, which is intended to show what standards and principles employees need to follow in their daily work in order to assist in handling corporate tasks in an efficient way.

It is important that this Code become a true guide for action, so that all employees, regardless of their positions, in sharing its provisions, and contribute to the enhancement of future highly productive business of NAC Kazatomprom JSC.

The success of NAC Kazatomprom JSC depends on each employee. That is why adhering to the Code accurately should become the highest priority for the employees of NAC Kazatomprom JSC.

CEO,  
NAC Kazatomprom JSC



# OUR VALUES

The driving force of our Company is our corporate values that we follow. These are the basis of our corporate culture, and they represent the unity of views and actions of employees, and contribute to the effective achievement of the Company's goals.

## RESPONSIBILITY

As the Company with a high civil responsibility, NAC Kazatomprom JSC seeks to observe the law and order in legal relations with employees, shareholders, partners and society. We are responsible for our decisions. We appreciate the reputation of the Company.

# TEAM

Our company is a product of coherent work of a united team based on the unity of views and principles, the aspiration to develop their human potential, team spirit and cooperation in order to achieve the overall goals of the Company.

# SECURITY

We take care of the environment; we are guided by the standards of compliance with the principles of safe business.

We support the culture of safe labor and we are responsible for safety.

# PROFESSIONALISM

An experienced team of managers and high standards of corporate governance – these are a key to our success.

# DEVELOPMENT

Amidst the rapid growth and economic transformations, the Company is continuously working to introduce innovations in its business and operations in order to meet customers' requirements in a proper way.

This means that:

- we experiment, look for new approaches to solving the tasks and introduce new technologies;
- we act boldly and do not miss out on new opportunities, anticipating the needs of customers;
- we challenge the conventional canons and find new ways and solutions to the tasks;
- we report problems, share ideas and encourage others around us to cooperate in furtherance of the objectives.





# RESPECT FOR EACH PERSON

- We build relationships with companies, customers and suppliers based on mutual respect, behaving properly and professionally in and out of the Company's office.
- We have a multinational workforce, so we take into account differences in language skills and national culture. The diversity of views leads to more favorable communication, which has a positive effect on partners, shareholders and other stakeholders, as well as in Kazakhstan and abroad.
- We do not discriminate in any form, type or description.







# INSIDER TRADING AND DISCLOSURE

- We are careful and considerate in handling confidential / inside information, especially with whom we talk, where and how we store it.
- We do not disclose or use any confidential / inside information for personal gain.
- We do not share inside information with anyone, including our family and friends. We never commit the crime of insider trading with Kazatomprom or third party securities.
- We provide full, reliable, accurate and timely disclosure of information in reports, documents and other public messages.

# COMPANY PROPERTY AND DATA

- We do not use company property or financial resources for personal (including family) use or benefit, or for any activity that raises a conflict of interest, or is inappropriate or illegal.
- We are provided with electronic resources such as email, telephone and laptop to help us in our work. We may occasionally use these resources for personal purposes if such use does not affect company systems, incurs excessive costs for the company or interferes with our work responsibilities.
- We do not modify, destroy or damage company property or company documents without permission to do so.

# CONFLICT OF INTERET

- We use common sense to avoid situations in which a conflict of interest could arise.
- We do not allow any conflict of interest to arise in any form, from procurement activities to restrictions on the joint work of close relatives, spouses and in-laws.
- We disclose any actual or potential conflicts of interest.
- We do not use our official authority to obtain undeclared benefits.

# HONEST AND OPEN COMPETITION

- We believe in free and fair competition. We are ethical and respectful of all applicable competition laws and restrictions on monopolistic activities around the world.
- We do not unlawfully obtain information about our competitors, suppliers or customers, and do not transmit false information about our competitors.
- When we interact with competitors or potential competitors, we do not share confidential information that could affect how we all compete.

# THROUGH SELECTION OF BUSINESS PARTNERS AND COLLEAGUES. Due Diligence

- We carefully select the suppliers, agents, consultants, subcontractors, investors, joint ventures and alliances with which we will work.
- We do not do business with those who could undermine our reputation, therefore we exclude cooperation with companies or persons who intentionally and / or constantly violate applicable law.
- We do not work with companies or individuals included in the lists of prohibited individuals or entities published by government agencies of different states.

# PREVENTION OF CORRUPTION AND BRIBERY

- We operate both domestically and internationally as a corporate citizen and deliver performance through our efficiency and innovation.
- We are committed to fighting bribery and corruption at all stages of our business. By strictly adhering to these obligations in day-to-day relationships with colleagues and business partners, we guarantee the strengthening of the Company's reputation.
- We never offer or accept bribes, no matter where we work, no matter the situation and who is involved. We also do not allow our agents, subcontractors, consultants, investors or suppliers to do this.
- We do not receive or provide gifts, services, meals, entertainment in order to influence decision-making in the work of the Company.





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We strongly recommend that all employees who become aware of any circumstances or actions, violations of the Code of Ethics and Company Compliance, to discuss these issues with us or report it via the hotline. If you have problems, don't ignore them.

Let us know.

- You can contact the Compliance Service at the numbers indicated in the handbook or at [compliance@kazatomprom.kz](mailto:compliance@kazatomprom.kz).
- If you wish, you can call the Ethics & Compliance hotline free of charge.

More detailed information on the Code of Ethics and Compliance of NAC Kazatomprom JSC can be obtained from the Compliance Service and / or on the website [www.kazatomprom.kz](http://www.kazatomprom.kz)

Kazatomprom categorically excludes the adoption of repressive measures in response to employee reports of existing or planned violations.

We guarantee confidentiality and anonymity. Consideration of 100% of requests.

Hotline contacts can be obtained on the website [www.kazatomprom.kz](http://www.kazatomprom.kz)

If you do not work for Kazatomprom, or if you do not have access to the directory, please report possible violations of the Code to the following email address [compliance@kazatomprom.kz](mailto:compliance@kazatomprom.kz).



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