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POLICY OF NAC KAZATOMPROM JSC IN THE FIELD OF HUMAN RIGHTS

1 Purpose

This Policy of NAC Kazatomprom JSC in the field of human rights (hereinafter - the Policy) has been developed in order to formalize the approach of NAC Kazatomprom JSC (hereinafter - the Company) regarding the respect for human rights, intolerance to all types of discrimination and ensuring diversity and inclusiveness.

2 Scope

2.1 This Policy applies to all structural subdivisions of the Company and is mandatory for all employees of the Company.

Rev. No.	Changed sheets	Developed by	Approved by
0.		Strategic and Sustainable Development Department Director, N.S. Abenov — _____ 20__	Decision of the Board of Directors of NAC Kazatomprom JSC No. _____ dated _____ 20__

2.2 Subsidiaries, affiliates and jointly controlled organizations of the Company are recommended to develop and approve a similar internal document based on this Policy in the prescribed manner.

3 Terms, definitions and abbreviations

3.1 **Discrimination** - any distinction, exclusion or preference based on race, skin colour, gender, religion, political opinion, national origin or social origin, and resulting in the elimination or violation of equality of opportunity or treatment in the field of employment and occupation (clause 1 of Article 1 of International Labour Organization Conventions No. 111 on Discrimination in Employment and Occupation (Geneva, 25 June 1958)).

3.2 **Stakeholders** - individuals, legal entities, groups of individuals or legal entities that influence or may be influenced by the activities of the Company, its products or services and related actions, by virtue of the norms of the legislation of the Republic of Kazakhstan, concluded agreements (contracts) or indirectly (indirectly). This definition does not apply to all those who may be familiar with the Company or express an opinion about it. The main representatives of stakeholders are shareholders, employees, customers, suppliers, government agencies, subsidiaries and affiliates, bondholders, creditors, investors, public organizations, the population of the regions where the Company and its subsidiaries and affiliates operate.

3.3 **Inclusiveness** - the creation of conditions in which different socio-cultural groups of people and each person individually are valued, accepted and respected for their unique skills, experience and development prospects; and in which they are given equal opportunities to participate in the success of the Company.

3.4 **Kandas** - a person belonging to a special group of the population, who is an ethnic Kazakh and (or) members of his/her family of Kazakh nationality, who were not previously citizens of the Republic of Kazakhstan, who arrived in their historical homeland and received the appropriate status in accordance with the legislation of the Republic of Kazakhstan.

3.5 **Disabled person** - a person belonging to a special group of the population and having a health condition with a persistent disorder of body functions caused by diseases, maiming injuries (wounds, injuries, contusions), their consequences, defects, which leads to a limitation of life and the need for social protection.

3.6 **Migrant** - a person belonging to a special group of the population who entered the Republic of Kazakhstan and left the Republic of Kazakhstan, as well as resettling within the Republic of Kazakhstan, regardless of the reasons and duration.

3.7 **Diversity** - the empowerment of people based on respect and appreciation of the differences among them in terms of age, gender, ethnicity, religion, disability, sexual orientation, education, nationality, abilities, social origin and other characteristics.

3.8 **Appeal** - an application or complaint sent in written (paper and/or electronic) or oral form, as well as in the form of videoconferencing, video message.

3.9 **UN** - United Nations.

3.10 **Human rights** - the inalienable rights of all persons, determined by their belonging to the totality of human persons. They are based on the recognition of the inherent dignity of the human person and the freedom and equality of all human beings.

3.11 **Forced labour** - all types of work or services that are required from any person under the threat of punishment and which were performed by the person who did not offer his/her services voluntarily (clause 1 of Article 1 of International Labour Organization Conventions No. 111 on Forced or Compulsory Labour (Geneva, 28 June 1930)).

4 General provisions

4.1 The Company recognizes the importance of respecting and observing the fundamental human rights proclaimed by the UN, including labour rights, the right to gender equality, the right to a favourable environment, the rights of indigenous peoples and special groups of the population, and others.

4.2 The Company ensures observance of human rights set forth in the Constitution of the Republic of Kazakhstan and in the current labour legislation of the Republic of Kazakhstan.

4.3 The Company recognizes the principles set forth in the following international standards and documents:

- The Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- UN Guiding Principles on Business and Human Rights;
- Declaration of the International Labour Organization on Fundamental Principles and Rights at Work;
- The UN Declaration on the Rights of Indigenous Peoples;
- The UN Voluntary Principles on Security and Human Rights;
- UN Global Compact.

4.4 In the event of discrepancies between the provisions of this Policy and the provisions of the legislation of the Republic of Kazakhstan, the Company will strive to comply with internationally recognized human rights, without violating the legislation of the Republic of Kazakhstan.

4.5 Company has zero tolerance for human rights violations throughout the entire value chain. The Company expects from suppliers, contractors and partners with whom it interacts the same strict compliance with the law and respect for human rights.

4.6 This Policy should be considered in conjunction with the Code of Ethics and Compliance of NAC Kazatomprom JSC, the Corporate Social Responsibility Policy of NAC Kazatomprom JSC, the Corporate Policy of NAC Kazatomprom JSC in the field of sustainable development and other relevant documents of the Company.

5 Respect for human rights

5.1 The Company accepts the following voluntary commitments to respect human rights:

5.1.1 The Company respects the honour and dignity of individuals, maintains a work environment free from any manifestations of physical, verbal, sexual or psychological pressure or harassment, aggression, abuse or threats in the workplace from colleagues or management.

5.1.2 The Company recognizes the rights of employees to freedom of assembly and association, freedom of opinion and expression.

5.1.3 Company does not allow any form of discrimination against any person based on age, gender, ethnicity, religion, disability, nationality, social status, sexual orientation or other characteristics not related to individual results of work.

5.1.4 The Company strives for social and cultural diversity among employees at all organizational levels.

5.1.5 The Company recognizes equal opportunities for women and men, equal pay for equal work.

5.1.6 The Company does not allow child, forced and compulsory labour.

5.1.7 The Company does not tolerate violence in the workplace in any form.

5.1.8 The Company provides a safe and healthy working environment at the workplace for all its employees.

5.1.9 The Company respects the rights, cultural characteristics and customs of local communities in the regions where it operates.

5.1.10 The Company shows zero tolerance for bribery and corruption.

5.2 The Company adheres to the above principles in relations with:

- employees;
- suppliers and contractors;
- local population in the regions where the Company operates;
- other stakeholders.

6 Diversity and Inclusion

6.1 The Company creates equal opportunities for all employees at every stage of promotion, training and development.

6.2 The Company promotes the values of diversity at all organizational levels.

6.3 The Company supports candidates from the regions of its presence, as well as migrants and kandases.

6.4 The Company respects the characteristics of disabled persons and accepts them as a component of human diversity.

6.5 The Company seeks to create a favourable working atmosphere in which every employee would feel accepted, respected and heard.

6.6 The Company accepts that diversity and inclusiveness contribute to increased competitiveness, productivity and efficiency of its activities.

6.7 Ensuring diversity and inclusiveness is the main practice of non-discrimination in the Company.

6.8 The Company provides equal rights and opportunities to all employees who have reached the age of majority, regardless of gender, in accordance with the labour legislation of the Republic of Kazakhstan.

6.9 The Company seeks to fully involve women in every aspect of activity and management by increasing the proportion of women in the succession pools in managerial positions. At the same time, the Company responsibly approaches the observance of the rights of women at work in order to minimize the risks to their health.

6.10 The Company strives to provide employees with disabilities with accessible information about mobility aids, devices and assistive technologies, including new technologies, as well as other forms of assistance to create comfortable and equal conditions in the workplace.

7 Implementation of the Policy

7.1 The Company recognizes and respects the rights and freedoms of stakeholders, provides maximum assistance in respecting rights, strives to raise awareness of human rights issues throughout the value chain.

7.2 The Company annually trains employees on the principles of respect for human rights, including issues of diversity and inclusiveness.

7.3 The Company undertakes various awareness-raising initiatives aimed at suppliers and contractors, business partners and the population in the regions of presence.

7.4 In order to minimize any potentially negative impact of its activities on human rights, the Company recognizes the importance of regularly identifying, analysing and assessing potential risks of human rights violations and developing timely responses before adverse consequences occur.

7.5 The Company conducts a regular analysis of the main risks related to the observance of human rights.

7.6 The Company conducts employee surveys to regularly assess their awareness and observance of human rights.

7.7 The Company takes measures to prevent violations of human rights.

7.8 If the Company determines what caused or contributed to negative impacts on human rights, the Company is ready to apply legal procedures to combat such impacts, cooperate with stakeholders and find a way out of the situation through dialogue, when employees or other persons consider that their rights have been violated.

7.9 The Company publishes relevant data on the observance of human rights in accordance with generally recognized international principles and standards in the field of disclosure of non-financial information in the integrated annual report of the Company.

8 Consideration of appeals

8.1 The Company ensures the operation of complaints handling processes designed to be legitimate, accessible, predictable, fair, and transparent.

8.2 The Company ensures the functioning of channels for submitting and considering appeals that are formalized and accessible to external and internal stakeholders, ensuring anonymity and confidentiality, unbiased consideration, preventing discrimination or other negative consequences for the applicant, and receiving feedback on the results.

8.3 Each application received is subject to due diligence. At the same time, the legislation of the Republic of Kazakhstan regulates the procedure for considering applications.

8.4 The process of considering complaints and requests is regulated in the Confidential Information Sharing Policy of NAC Kazatomprom JSC.

9 Final provisions

9.1 This Policy is subject to periodic review to ensure compliance with international human rights standards and relevant provisions of the legislation of the Republic of Kazakhstan.

9.2 The Company openly declares its rejection of human rights violations and places this Policy in the public domain on the corporate website.

9.3 The Company takes measures to ensure that employees are familiar with this Policy and share the commitment to respect for human rights.