

NAC Kazatomprom JSC	CS	Compliance
Status: effective	K 03 __ AB	page 1 of 14

Settlement of Corporate Conflicts and Conflicts of Interests in JSC NAC Kazatomprom Regulation

1. Purpose

1.1 This Regulation on Settlement of Corporate Conflicts and Conflicts of Interests in JSC NAC Kazatomprom (hereinafter – the Regulation) was developed in accordance with the laws of the Republic of Kazakhstan, Charter of JSC NAC Kazatomprom (hereinafter – the Company), internal regulations of the Company.

1.2 This Regulation defines the basic principles for prevention and settlement of corporate conflicts and conflicts of interests, reasons for occurrence of corporate conflicts and conflicts of interests, procedures for consideration of corporate conflicts and conflicts of interests, procedures for settlement of corporate conflicts and conflicts of interests, sequence and methods for disclosing information on conflicts of interests, actions of the bodies of the Company within the measures for settlement of corporate conflicts, responsibility of persons, and conditions for application of this Regulation.

2. Scope

Principles and requirements of this Regulation shall over relationships between bodies, employees and stakeholders of the Company.

Ver. #	Pages changed*	Developed	Reviewed	Approved
0.		Head of Compliance S. Sarbassov _____ 2019	Resolution of the Management of NAC Kazatomprom JSC # 26/19 27 August 2019	Resolution of the Board of Directors of NAC Kazatomprom JSC # 9/19 18 September 2019

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4. Terms and Definitions

4.1 **Bodies of the Company** – general shareholders’ meeting, Board of Directors, Management Board.

4.2 **Corporate conflict** – disputes on the issues of corporate governance between a shareholder and the bodies of the Company, or between the bodies of the Company and employees/officials of the Company, or a body of the Company and stakeholders of the Company, which negatively impact or may impact interests of the shareholders and operations of the Company.

4.3 **Conflict of interests** – a situation when an employee makes a decision, participates in decision making or performs other actions related to his or her position that affect or may affect the personal or material interests of such employee, his/her relative, and affect or may affect the interests of the Company.

4.4 **Stakeholder** – person which is interested in performance results of the Company and affected by the Company, including investors of the Company.

4.5 **Mediator** (single person or collective body) – person or group of persons (consenting commission), who are not a party of the corporate conflict and do not have interests therein, specially authorized (elected) by all parties for undertaking procedures for settling the corporate conflict.

4.6 **Settlement of corporate conflicts** – performing a complex of measures aimed at prevention and/or settlement of corporate conflicts.

4.7 **Agreement** – document resulting the process of settling the corporate conflict.

4.8 **Responsible person** – Chief Executive Officer / Chair of the Board of Directors of the Company (as per allocation of duties).

5. Basic principles for prevention and settlement of corporate conflicts and conflicts of interests

5.1 The Company takes into account the following principles when preventing and settling corporate conflicts and conflicts of interests:

- voluntariness – condition for participation in the mediation procedure is a mutual voluntary will of the parties, expressed in the mediation agreement;

- equal rights of parties of the mediation – parties of the mediation shall exercise equal rights when selecting the mediator, procedure for mediation, its position therein, ways and measures for standing of the position, when receiving information, in assessment of acceptability of the terms and conditions of the agreement for settlement of the conflict, and shall bear equal liabilities;

- the mediator shall be unprejudiced, make mediation in the interests of both parties, and ensure equal participation in the mediation process to the parties. In case of circumstances preventing the mediator’s independence, he/she must reject from the mediation;

- responsibility and initiative for disclosure of the conflict of interests and of circumstances leading to arising potential conflict of interests;

- individual consideration of circumstances of each conflict of interests;

- confidentiality of the process of disclosing the conflict of interests and the process of its settlement.

5.2 Employees and officials of the Company shall be responsible for:

- when discharging official duties, to place interests of the Company above personal interests;

- assess the possibility of a conflict of interests in each situation, and to evade actions which may lead to its occurrence;

- take actions for purpose of excluding cases of personal use of confidential information by persons having access to such information;

- detect risks and reasons for inefficiency of the internal control system of the Company;

- comply with the principles of corporate business ethics;

- initiate assistance in settlement of the found conflict of interests.

6. Reasons for occurrence of corporate conflicts and conflicts of interests

6.1 Corporate conflicts and conflicts of interests may arise as a result of:

- incompliance with laws of the Republic of Kazakhstan and internal regulations of the Company;
- adoption of resolutions by the bodies of the Company which may lead to worsening of financial conditions of the Company and damages to the Company;
- non-disclosure in accordance with the laws of the Republic of Kazakhstan or submission of incomplete information by employees of the Company about positions taken by them in governing bodies of other organizations, holdings (shares) in other legal entities;
- decision-making by officials and other employees of the Company, or doing actions, which contradict interests of the shareholders and the Company;
- presence of financial interests of employees in other legal entities with which the Company has business relationships;
- possession by employees or their family members of interests (shares) in other legal entities;
- combined jobs of an official or participation in operations of bodies of other legal entities;
- provision of business opportunities to other legal entities to the Company's and shareholders' detriment, due to personal property interests.

7. Process of consideration of corporate conflicts and conflicts of interests

7.1 The process of consideration of corporate conflicts and conflicts of interests shall commence with a written application (appeal, letter or claim) (hereinafter – the Application) by any party of the corporate conflict / conflict of interests, addressed to members of the Board of Directors, Corporate Secretary, Compliance Service, Ombudsman of the Company, or by the channels of confidential reporting.

7.2 Acceptance and registration of the Applications shall be done in the following way:

7.2.1 Applications received via post, shall be registered by the Document Flow Unit under the Administrative Department of the Company.

7.2.2 Applications received via the channels of confidential reporting – in the procedure set out by the Policy for Confidential Reporting.

7.2.3 Applications received by the Corporate Secretary or the Compliance Service, shall be registered respectively by the Corporate Secretary's Office and the Compliance Service in the separate registration ledgers.

7.2.4 Applications received by the Ombudsman of the Company, shall be registered by the Ombudsman's Service.

7.3 After analyzing the received Application, the recipient of the Application shall address the Chair of the Board of Directors of the Company within 3_(three) business days after registration of the Application (or to any of the Board members of the Company in case of the Chair's interest in the conflict) for the purpose of assigning the Mediator for settlement of the corporate conflict or conflict of interests, and shall determine:

- 1) whether the situation actually leads to occurrence of the corporate conflict or conflict of interests;
- 2) whether actions (inactions) of the employee or the official are caused by the corporate conflict or conflict of interests;
- 3) whether the personal interest of the employee or official is the basis for occurrence of the corporate conflict or conflict of interests.

7.4 Compliance Service deals with conflicts of interests and delivers suggestions and recommendations for settlement of the occurred conflict of interests in accordance with the allocation of duties stipulated by clauses 7.5 – 7.8 of the Regulation.

7.5 The Board of Directors shall carry out settlement of corporate conflict or conflict of interests on the issues relating to members of the Board of Directors.

7.6 The Board of Directors considers particular corporate conflict or conflict of interests which fall within the duties of the Chief Executive Officer, in cases when the subject of the corporate conflict or conflict of interests is the actions (inactions) of the Chief Executive Officer or members of the Management, or resolutions adopted thereby, as well as in case when the conflict of interests / corporate conflict occurs at / among all the members of the Management of the Company.

7.7 Chief Executive Officer shall carry out settlement of corporate conflict or conflict of interests on all issues, which do not fall within the duties of the Board of Directors.

7.8 The general shareholders meeting shall consider corporate conflict or conflict of interests which refer to the duties of other bodies of the Company, in cases of the conflict of interests / corporate conflict at / among all the Board members / Management of the Company.

7.9 Any corporate conflict / conflict of interests shall be, if possible, considered by the supervising body of the Company in case when the parties of the conflict failed to conclude the Agreement.

8. Procedures for settling corporate conflicts

8.1 For the purpose of efficient settlement of corporate conflicts, the persons whose interests are affected or potentially affected by the corporate conflict, shall not take part in its settlement.

8.2 The person responsible for settling the corporate conflict in the Company, shall make decision on determination of the Mediator and notify the parties of the conflict about this decision within 10 (ten) business days since receipt of the Application. The parties of the conflict may express their disagreement with such a decision, by forwarding a motivated reply to the responsible person.

8.3 The Mediator shall notify the Board of Directors about the subject of the corporate conflict.

If the Mediator is one of the parties of the corporate conflict and/or the Mediator has a conflict of interests with respect to discharging the role of Mediator, the function of Mediator upon the Board's resolution may be discharged by the authorized committee under the Board of Directors, if it does not contradict the laws, internal regulations of the Company, and this Regulation.

8.4 Role of Mediator in settling the corporate conflicts which fall within the duties of the Chief Executive Officer, shall be assigned to the person determined by the Chief Executive Officer.

8.5 In cases when determination of the Mediator cannot be done within the established deadlines, the Board of Directors shall on their own carry out settlement of the corporate conflict on the issue which falls within their duties.

8.6 The Mediator does not make the final decision on the essence of the corporate conflict, but only facilitates the Parties of the corporate conflict in finding solution for the corporate conflict.

8.7 Within 5 (five) calendar days since the date of the Mediator's election, the person responsible for settling corporate conflict and conflict of interests in the Company forwards the Mediator documents with indication of the subject and parties of the corporate conflict, wording of the problem (dispute) lying under the corporate conflict, with attachment of a copy of the Application from the party of the corporate conflict and the written consent of the parties to settle the corporate conflict.

8.8 Within 5 (five) calendar days since receipt of all the materials listed in clause 8.7 of the Regulation, the Mediator starts consideration of the corporate conflict, notifying in writing the parties of the corporate conflict.

8.9 Within 7 (seven) calendar days since notifying the parties about acceptance of the corporate conflict for consideration, the Mediator consents in writing with the parties of the corporate conflict:

- the date of meeting for consideration of the corporate conflict;
- responsibility to execute the solutions for settlement of the corporate conflict, as accepted by the parties.

This consent shall be done by way of receiving the respective written confirmation from the parties.

8.10 Each party of the corporate conflict may suggest the Mediator its own wording for the subject of the corporate conflict and the way of resolving the corporate conflict. Such information shall be delivered to the Mediator by the parties of the corporate conflict within 3 (three) calendar days since receipt of the notification from the Mediator about readiness to consider the corporate conflict.

If needed, the Mediator may inquire the parties of the corporate conflict with additional explanations regarding reasons, which caused the corporate conflict, and the status of its development. With the consent of the parties of the corporate conflict for consideration of the corporate conflict by the Mediator, they shall submit thereto all necessary data on the subject of the corporate conflict. The Mediator may also inquire information from the bodies of the Company, if these are necessary for consideration of the corporate conflict, as well as from other employees of the Company, and they in turn, shall deliver such information to the Mediator within the deadlines set by the Mediator.

8.11 During the process of settling the corporate conflict, the Mediator shall apply methods of interviews, talks, negotiations.

The Mediator, if consented by the parties of the corporate conflict, may use electronic communication means for interviewing the parties of the corporate conflict, discussing problems and preparing draft Agreement. At the same time, he or she must guarantee non-disclosure of information to third parties.

8.12 Within the preliminary consideration of the corporate conflict, the Mediator prepares suggestions for the parties of the corporate conflict and solutions for settling the corporate conflict. These suggestions shall be sent by the Mediator to the parties of the corporate conflict with a notification about the meeting for consideration of the corporate conflict, with indication of the venue and time of the meeting.

8.13 When considering the corporate conflict, the Mediator may, by an inquiry of the parties of the corporate conflict or on his/her own, invite other persons to the meeting (experts, etc.). The final composition of the invitees shall be defined by the Mediator on his/her own. The witnesses being officials or employees of the Company, if called by the Mediator, shall attend the meeting for consideration of the corporate conflict.

8.14 Not later than 5 (five) calendar days prior to meeting, where the corporate conflict will be considered, the Mediator shall make the possessed materials available to the parties of the corporate conflict, unless a longer term is agreed by the parties of the corporate conflict.

8.15 All meetings shall be recorded by the Mediator. These records shall be signed by the Mediator and the Parties of the corporate conflict. If necessary and if decided by the Mediator, the voice recording may be done at the meetings.

8.16 Representatives of the parties of the corporate conflict, attending the meetings, will be entitled with the rights of the party of the corporate conflict, including the signing rights under the Agreement. The authorities of the representatives shall be confirmed by proxies made under the laws of the Republic of Kazakhstan. When considering the corporate conflicts, all parties of the corporate conflict shall exercise equal rights. The parties shall prove the circumstances, they refer upon as the basis for their claims and objections, shall use the defending means, declare, argue facts, give proof and objections against the proofs of the other party.

8.17 The Mediator shall facilitate the parties of the corporate conflict in formalizing the agreed subject of the conflict based on the wording suggested by the Parties of the corporate conflict, as well as assists in development of the mutually acceptable wording of the Agreement.

8.18 Upon results of considering the corporate conflict, the Mediator may prepare recommendations for solvation of the corporate conflict and deliver to the parties of the corporate conflict. The final decision shall be made by the parties of the corporate conflict, which is reflected in the respective minutes and the Agreement.

8.19 Agreement on settlement of the corporate conflict shall be deemed accepted, if it is:

- formalized in writing under the format set out in Annex 1 to this Regulation;
- signed by the parties of the corporate conflict.

8.20 Within 3 (three) days after sign-off of the Agreement by the parties of the corporate conflict, the Mediator shall forward copies thereof to the parties of the corporate conflict.

8.21 In case when the agreed upon Agreement has not been signed by the parties of the corporate conflict, the Mediator may decide to stop or continue the mediating procedure, and to notify about his/her decision and the motives to the parties of the corporate conflict and the body of the Company, which is in charge of settlement of the corporate conflict, or the person responsible for settlement of corporate conflicts and conflicts of interests in the Company.

8.22 The Mediator may deliver the issue of reasonableness for consideration of the corporate conflict to the body of the Company which is in charge of the settlement of the corporate conflict, and in case the body of the Company decides unreasonable to consider, to refuse from consideration of the corporate conflict.

8.23 In cases requiring settlement of issues set in the application of a party of the corporate conflict, or need for additional checks, inquiry of additional documents, taking other actions, the deadlines for consideration and for decision-making on settlement of the corporate conflict stipulated by the Regulation, may be prolonged with respective note to the parties of the corporate conflict and the body of the Company responsible for settlement of the corporate conflict, or the person responsible for settlement of corporate conflicts and conflicts of interests in the Company.

8.24 Upon results of settlement of the corporate conflict, all materials (letters, correspondence (including emails), minutes, voice-records, proxies, appeals, applications, notifications, etc.) shall be handed by the Mediator to the archive of the Company for storage, as required by the File Register of the Company.

8.25 In cases when the corporate conflict was not settled with facilitation of the Mediator within this Regulation, this issue shall be considered by the bodies of the Company in accordance with the laws of the Republic of Kazakhstan.

8.26 Resolution of the Management on the corporate conflict may be appealed by the parties of the corporate conflict to the Boards of Directors within 10 (ten) days after handing a copy of the Management's resolution on this corporate conflict to the party of the corporate conflict.

8.27 In case of impossibility for pre-trial settlement of the corporate conflict in the procedures set by this Regulation, it may be settled in the trial order.

8.28 Settlement of the corporate conflict in accordance with this Regulation is possible only when this corporate conflict does not simultaneously settled in the other way in accordance with the laws of the Republic of Kazakhstan, and is not subject for consideration by the state bodies authorized by the laws of the Republic of Kazakhstan.

8.29 In the course of preparing for consideration of the corporate conflict, the Mediator shall ensure that:

- the corporate conflict does not contain features which require its delivery to the state bodies;
- the corporate conflict may be considered in the way stipulated by this Regulation, and the decision made under this procedure does not contradict the laws of the Republic of Kazakhstan;
- consideration of the corporate conflict and decision on its settlement do not violate rights and legal interests of shareholders and the Company.

8.30 In case of detected obstacles for consideration of the corporate conflict in the way stipulated by the Regulation, the Mediator shall make a written decision on impossibility for consideration of the corporate conflict with indication of all circumstances, and deliver this decision to the parties of the corporate conflict. The Mediator shall notify the parties of the corporate conflict

about the made decision, but he/she is not obliged to explain the reasons and present proofs. Since the date of such a decision by the Mediator, the functions of the Mediator on this corporate conflict shall stop.

9. Sequence and methods for disclosing conflicts of interests

9.1 In order to disclose the conflict of interests, employees and officials of the Company shall complete the declaration on the conflict of interests as per the form according to Annex 2 to the Regulation:

- 1) when recruiting, or transferring to a new position;
- 2) annually, upon expiry of the earlier completed declaration.

9.2 An employee of the Company who possesses information on the conflict of interests of other employees and/or officials of the Company, shall immediately report about the conflict of interests to his/her line manager or the Compliance Service. It is acceptable to report via the channels of confidential reporting available at the Company.

9.3 Employees of the Company shall disclose the conflict of interests within the following deadlines:

- 1) in case of occurring potential conflict of interests – not later than 5 (five) business days after such occurrence;
- 2) upon request from the Compliance Service (including electronic inquiry) – not later than 3 (three) business days after such a request;
- 3) during conducted check of submitted information on the conflict of interests – within 1 (one) business day after request for disclosure.

10. Procedures for settling conflicts of interests

10.1 In case of detected conflict of interests, the line manager who received the application from the employee, shall decide on settlement of the conflict of interests by one of the following ways:

- 1) refusal of the employee from his/her personal interest;
- 2) prohibition for the employee to use the information which is the source of the conflict of interests;
- 3) continuous or temporary removal of the employee from discussion and consideration of the issues which create the conflict of interests, on voluntary or directive basis;
- 4) change of the employee's job functions, upon agreement with the employee;
- 5) transfer of the employee to a position not related to the conflict of interests, upon consent of the employee, in the order stipulated by the labor laws of the Republic of Kazakhstan.

10.2 The line manager shall notify the employee about unacceptance of breaching the rules for conflicts of interests, as they are set for anti-corruption purposes, and warn his/her about the liabilities applicable in case of such a breach.

10.3 When deciding on the way for settlement of the conflict of interests, the line manager shall take into account the significance of the employee's interest, and the possibility of such an interest to affect the interests of the Company, as well as the heaviness of the corruption offence committed by the employee, as well as other circumstances.

10.4 The line manager shall notify the Compliance Service about the received application on the conflict of interests within 3 business days since receipt of such an application, and on the taken actions for settlement of the conflict of interests within 3 days after such actions.

10.5 In case of non-disclosure of the conflict of interests and/or inaction of the employee for prevention or settlement of the conflict of interests where he/she is a party in, there might be disciplinary measures applied.

10.6 In case of disagreement of the employee with the results of the application consideration, or inability to make decision on the present conflict of interests, determination of the scales of arising risks, or selection of the method for settling the conflict of interests, the line manager may forward the application for consideration of the Compliance Service.

10.7 Information on the conflict of interests, which at any stage of its development affects or may affect the interests of the Chief Executive Officer or other members of the Management, shall within 3 (three) business days be forwarded to the Board of Directors for decision-making.

10.8. If in the result of consideration of the conflict of interests there is a need to develop or amend the existing internal documents of the Company, the authorized body of the Company shall make a decision on approval of the internal document of the Company in new wording, or amendments thereto.

11. Actions of the bodies of the Company within the measures for settlement corporate conflicts and conflicts of interests

11.1 The main task of the Company in the process of settling the corporate conflicts and conflicts of the interests shall be to find the solution which would not contradict the laws of the Republic of Kazakhstan, Charter of the Company, Code of Corporate Governance and internal documents of the Company, and comply with the interests of shareholders and the Company.

11.2 Bodies of the Company, in accordance with their duties, control, facilitate and bear responsibility for execution of agreements signed by the parties of the corporate conflict, as well as for the decisions adopted during settlement of conflicts of interests.

12. Responsibility

12.1 In case when during prevention or settlement of corporate conflicts and conflicts of interests, there are breaches of the laws of the Republic of Kazakhstan, provisions of the Charter of the Company, Code of Corporate Governance and internal documents of the Company, as well as other provisions of this Regulation, which lead to losses to the Company and (or) its shareholder, the persons guilty of such breach shall be liable under the laws of the Republic of Kazakhstan.

Template of Agreement for Settlement of Corporate Conflict

AGREEMENT
Place _____
Date (date of sign-off by the latter Party) _____
Subject of the agreement (corporate conflict) _____
Participants of the agreement, including:
Parties of the agreement (listed names of the Parties of the corporate conflict and their authorized representatives)

Mediator _____
Experts (other participants, if any):

<i>Further the text of the agreement is written, stipulating the responsibilities of the Parties of the corporate conflict / conflict of interests, actions for ensuring execution of the responsibilities.</i>
Satisfaction of the Parties:
- on essence of the issue,
- on the procedure;
- psychological.
<i>(Each of the Parties shall need to indicate “satisfied” or “unsatisfied”, and add comments, if any. In this section the Parties fix in free format the extent of their satisfaction by different aspects of the procedure for settlement of the corporate conflict / conflict of interests)</i>
Signatures of the participants:
Parties:
Signature: _____ Date: _____
Mediator:
Signature: _____ Date: _____

**Declaration
on the conflict of interests**

(position, surname and name of the declarant's employer)

(full name and position of the declarant)

(organization, entity)

“ ___ ” _____ 20__
(date of completion)

This document is confidential and shall be used only by JSC NAC Kazatomprom. Information submitted in the declaration, shall not be disclosed to third parties.

The declarant shall need to thoroughly read the questions below, and respond “Yes” or “No” to each of them. At the same time it should be noted that the response “yes” DOES NOT necessarily confirm presence of the conflict of interests, but indicates the aspects which require a separate discussion and settlement.

Validity term of the declaration is 1 year.

Application

Before competing this Declaration, I have read:

- Code of Ethics and Compliance of JAS NAC Kazatomprom (approved with resolution of the Board of Directors dated 26.09.2018 # 8/18);
- Policy for Prevention of Corruption and Fraud at JSC NAC Kazatomprom (approved with resolution of the Board of Directors dated _____ # _____);
- Provision on Settlement of Corporate Conflicts and Conflicts of Interests in JSC NAC Kazatomprom (approved with resolution of the Board of Directors dated _____ # _____);

(signature, name of the declarant)

“ ___ ” _____ 20__

The declarant shall complete and sign each page by hand

#	Question	Yes	No
	Please list out legal entities held by you or your close relatives, indicate whether you or your close relatives operate as individual entrepreneurs:		

#	Question	Yes	No
	Please list out close relatives (full name, date of birth), and indicate the ones who work for entities of the company (position, division, entity):		
	For current employees of the Company: Please indicate whether these relatives are under your line supervision, or are your line managers, as well as whether you and your relatives participate in one production process:		
External interests and assets			
1.	Are you or a person representing your interests, a direct owner, beneficial owner or shareholder of, or otherwise have a financial interest in:		
1.1.	Assets of JSC NAC Kazatomprom?		
1.2.	Other organization which is a business partner of JSC NAC Kazatomprom (counteragent, vendor, supplier, etc.)?		
1.3.	Other organization which plans to become or attempts to become a business partner of JSC NAC Kazatomprom, or is conducting negotiations therewith?		
1.4.	In operations of other persons (legal entities or individuals), whose goals, interests and sphere of operations are similar to the goals, interests and sphere of operations of JSC NAC Kazatomprom?		
1.5.	In an organization which is a party of a court or other trial with JSC NAC Kazatomprom? In case of a positive answer, please indicate whether you have been informed about it by a representative of the organization, who is in charge of anti-corruption?		
2.	Are you and/or your close relatives and/or persons representing your interests, members of the supervisory bodies (Board of Directors, Supervisory Boards) or executives (chief officers, deputies, etc.), as well as employees, advisors, representatives or other affiliated persons:		
2.1.	In subsidiaries and associated companies (hereinafter – SUBS) of JSC NAC Kazatomprom?		
2.2.	In another organization which is a business partner of JSC NAC Kazatomprom or SUBS (counteragent, vendor, supplier, etc.)?		
2.3.	In an organization which plans to become or attempts to become a business partner of JSC NAC Kazatomprom or SUBS, or is conducting negotiations therewith, including the ones participating in the procurement procedures / auctions for supply of goods, works, services for JSC NAC Kazatomprom or SUBS?		
2.4.	In operations of competitors of JSC NAC Kazatomprom or SUBS (any legal entities of individuals)?		
Private interests and fair business conduct			
3.	Have you taken part in any commercial transaction on behalf of JSC NAC Kazatomprom or SUBS (as a decision-maker, person responsible for execution of the contract, acceptance of works or services, signatory to acceptance acts, etc.), where you and/or members of your family (such as parents, spouse, children, brothers, sisters, as well as brothers, sisters, parents, children of the spouse, and spouses of the children) had a private interest?		
4.	Have you provided assistance to a business partner of JSC NAC		

#	Question	Yes	No
	Kazatomprom or SUBS, where you and/or members of your family (such as parents, spouse, children, brothers, sisters, as well as brothers, sisters, parents, children of the spouse, and spouses of the children) had a private interest?		
5.	Have you authorized payments from JSC NAC Kazatomprom and SUBS, where the amount of remuneration of the counteragent for the services provided to JSC NAC Kazatomprom or SUBS (within the objective valuation of market conditions) exceeded the justified remuneration for the actually received services, or could be otherwise treated as an illegitimate or unethical impact to the commercial transaction of JSC NAC Kazatomprom”?		
Equal rights of employees			
6.	Do your close relatives (such as parents, spouse, children, brothers, sisters, as well as brothers, sisters, parents, children of the spouse, and spouses of the children) work under your line supervision in JSC NAC Kazatomprom?		
7.	Do your close relatives (such as parents, spouse, children, brothers, sisters, as well as brothers, sisters, parents, children of the spouse, and spouses of the children) work at the positions which may impact evaluation of your performance efficiency?		
8.	Have you facilitated recruitment of your close relatives (such as parents, spouse, children, brothers, sisters, as well as brothers, sisters, parents, children of the spouse, and spouses of the children) to JSC NAC Kazatomprom, nomination to a higher position, evaluated their performance, determine the amount of salary, or influenced the question of non-imposing disciplinary measures thereto?		
Other questions			
9.	Are you aware of other situations or circumstances not described above, which lead or may lead to a conflict of interests, or may create an impression of your colleagues and managers, that you are in a conflict of interests when decision-making?		
If responding “Yes” to any of the above questions, please additionally describe in writing details, necessary and sufficient for a comprehensive consideration and assessment of the circumstances.			

STATEMENT

1. I hereby confirm that I have read and understood the above questions, and my answers thereto, as well as other explanatory information, are complete, true and fair.

2. I hereby permit JSC NAC Kazatomprom to process my personal data indicated in this declaration.

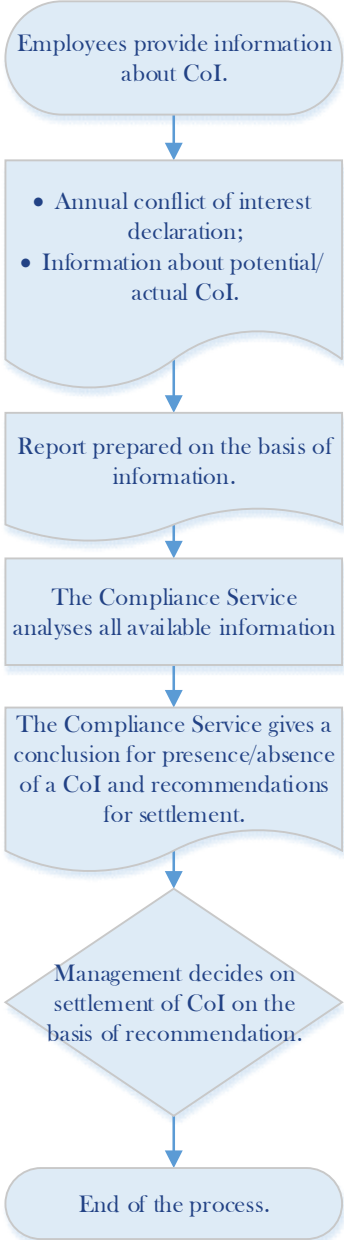
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(signature, name of the declarant)

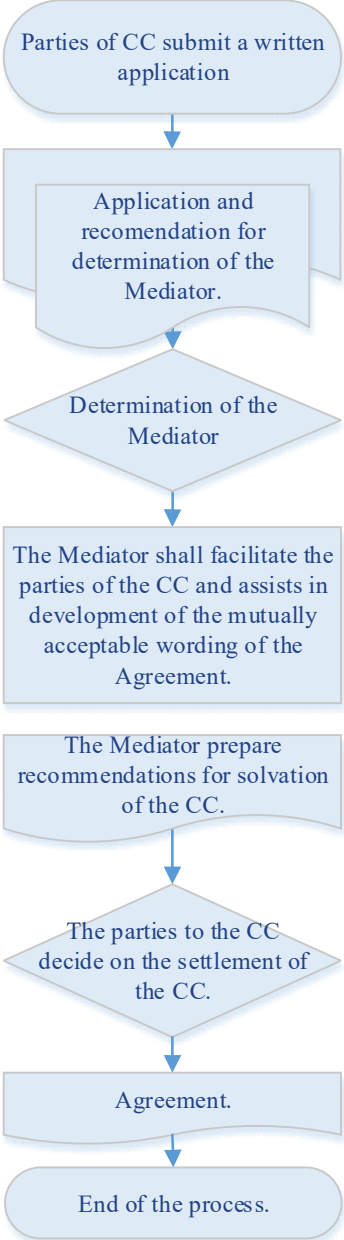
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Annex 3

Process of identification and settlement of conflicts of interest (CoI):



Process of settlement of corporate conflicts (CC):



LIST
of consent to draft Regulation on Settlement of Corporate Conflicts and Conflicts of Interests
in JSC NAC Kazatomprom

#	Division	Position	Name	Signature	Date
1	Legal	Director	A. Pirmatov		
2	Security	Director	B. Alzhanov		
3	HR	Director	L. Kozhakhmetova		
4	Corporate Secretary	Corporate Secretary	M. Tnymbergenova		
5	Ombudsman	Ombudsman	B. Zhylkishiyev		
6	Administrative	Director	B. Kakenova		