Kazatomprom Anti-Corruption and Corporate Fraud Policy

Developed by	Reviewed by	Approved by
D. Ishin, Head of Compliance Service, NAC Kazatomprom JSC.	Decision of the Management Board of NAC Kazatomprom JSC No. 28/25 dated October 09, 2025	Decision of the Board of Directors of NAC Kazatomprom JSC No. 10/25 dated October 30, 2025

1 Purpose

This Anti-Corruption and Corporate Fraud Policy (the "Policy") of NAC Kazatomprom JSC defines the objectives, principles, and key elements of the management system aimed at preventing, detecting, and suppressing corruption and corporate fraud. The Policy establishes mandatory requirements for all employees of the Company, as well as third parties acting on behalf of or in the interests of the Company.

2 Scope

2.1 The provisions of this Policy apply to all employees of the Company, including employees engaged on the basis of contracts for the provision of paid services and outstaffing, regardless of the form of employment relationship, covering all business processes, operational activities, corporate functions, and management levels without exception.

2.2 The Policy applies to all activities of the Company regardless of geographical location and applicable jurisdiction. Employees of the Company are required to comply with the requirements of this Policy both when conducting activities within the territory of the Republic of Kazakhstan and outside its borders, provided that this does not conflict with the mandatory requirements of the legislation of foreign states. In the event of any conflict between the requirements of this Policy and local law, employees are required to immediately notify the Company's Compliance Service for clarification and instructions.

2.3 This Policy also applies to third parties acting on behalf of, in the interests of, or jointly with the Company, to the extent provided for in the relevant contracts and agreements.

2.4 The Policy is considered an act of the employer for the purpose of applying disciplinary measures for its violation in accordance with the labor legislation of the Republic of Kazakhstan.

2.5 Based on this Policy, subsidiaries, dependent and jointly controlled entities of the Company are recommended to develop and approve a similar internal document in accordance with the established procedure.

3 Regulatory references

The following reference documents on standardization are required to apply this Policy.

ST RK ISO 37001-2017 - Anti-Bribery Management Systems. Requirements and guidelines for use.

Note – when using this Standard, it is advisable to check the validity of the referenced standards in the "Standardization Documents" catalog and in the relevant periodically published information indexes of standards published in the current year, as well as in the list of internal documents in the Company's electronic database, as of the current year. If a referenced document has been replaced (amended), then when using this standard, the replaced (amended) document should be used as a guide. If a referenced document has been cancelled without replacement, then the provision in which it is referenced shall apply insofar as it does not affect this reference.

4 Terms, definitions and abbreviations

4.1 The following terms and definitions are used in this Policy.

4.1.1 **Anti–Corruption Standard** is a system of recommendations established for the Company's activities aimed at preventing corruption. The Company's Anti-Corruption Standard is provided in Annex 1 to this Policy.

4.1.2 **Business Partner** - any legal entity or individual with whom the Company has or plans to establish any commercial relations.

4.1.3 **Bribe** – an offer, promise, provision, acceptance, or solicitation of an undue advantage of any value (which may be financial or non-financial), directly or indirectly, and regardless of where it is committed, in violation of applicable law, as an incentive or reward to a person acting contrary to their duties, or to otherwise induce that person to engage in unlawful conduct.

4.1.4 **High corruption risk** – the level of corruption risk where there is a significant likelihood of corruption offenses being committed without additional control measures being taken.

4.1.5 **Senior management** – members of the Board of Directors and the Management Board of the Company.

4.1.6 **Due diligence** - the process of identifying, evaluating, and understanding corruption risks associated with specific projects, transactions, business partners, or geographic regions.

4.1.7 **Stakeholders** - natural or legal persons who may influence the Company's activities, be affected or consider themselves to be affected by the Company's decisions and activities.

4.1.8 **Conflict of interest** - a situation in which, in the performance of their official duties, an employee of the Company makes a decision, participates in decision-making, or performs other actions related to their position that affect or may affect the personal or material interests of the employee themselves, their close relative, spouse, or in-law, and affect or may affect the interests of the Company.

4.1.9 **Corruption risk** – the possibility of causes and conditions contributing to the commission of corruption offenses.

4.1.10 **Corruption** – the unlawful use by persons holding responsible public office, persons authorized to perform public functions, persons equivalent to persons authorized to perform public functions, officials of their official (official) powers and related opportunities for the purpose of obtaining or extracting, personally or through intermediaries, property (non-property) benefits and advantages for themselves or third parties, as well as the bribery of such persons by providing benefits and advantages.

4.1.11 **Corporate fraud** – actions or inaction of individuals and/or legal entities with the aim of obtaining personal gain and/or gain for another person to the detriment of the Company's interests and/or causing material and/or non-material damage to the Company through deception, abuse of trust, misrepresentation, or otherwise.

4.1.12 **Facilitation payments** – small payments to officials to expedite or secure routine government actions, which are prohibited by this Policy regardless of their size and local customs.

4.1.13 **Employee** – a natural person who is in an employment relationship with the Company and directly performs work under an employment contract, as well as outsourced employees.

4.1.14 **Anti–Corruption Management System (ACMS)** - a part of the Company's management system, which includes the organizational structure, policies, procedures and resources for the implementation and maintenance of Policy. The ACMS includes an anti-bribery management system and measures to combat other forms of corruption.

4.1.15 **Anti–Bribery Management System (ABMS)** - a part of the anti-corruption management system aimed at preventing, detecting and responding to bribery in accordance with the requirements of ST RK ISO 37001.

4.1.16 **Third parties** - agents, consultants, intermediaries, suppliers, contractors, joint ventures and other persons acting on behalf of, in the interests of, or jointly with the Company within the framework of contractual obligations.

4.2 The following abbreviations are used in this Policy:

4.2.1 **S&A** - affiliates are subsidiaries, dependent and jointly controlled organizations of the Company.

4.2.2 **Audit Committee** – the Audit Committee under the Company's Board of Directors.

4.2.3 **Management Board** - the collegial executive body of the Company.

4.2.4 **Compliance Service** – Company's Compliance Service.

4.2.5 **Board of Directors** - Company's governing body.
4.2.6 **Fund** - Samruk-Kazyna JSC.

5 General

5.1 This Policy has been developed in accordance with the current anti-corruption, administrative, and criminal legislation of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan “On Anti-Corruption,” applicable international legislation and standards, including the United Nations Convention against Corruption, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the UK Bribery Act, ST RK ISO 37001, the Corporate Standard on Compliance Functions of Samruk-Kazyna JSC, the Code of Ethics and Compliance of NAC Kazatomprom JSC, the Corporate Governance Code, and other internal documents of the Company.

5.2 The Company requires unconditional compliance with anti-corruption legislation of all applicable jurisdictions and business practices, as well as international standards in the field of anti-corruption. In the event of any conflict between applicable regulations, the Company shall follow the stricter requirements. The Policy requires compliance with anti-corruption legislation and other requirements applicable to the Company, as well as Samruk-Kazyna JSC documents in the field of anti-corruption.

5.3 The Company undertakes to implement, maintain, and continuously improve its anti-corruption management system in accordance with the requirements of ST RK ISO 37001. This Policy has been developed taking into account the provisions of the aforementioned standard and is aimed at ensuring compliance with best international practices, the legislation of the Republic of Kazakhstan, and the Company's internal documents.

5.4 The Company strictly prohibits any form of corruption and corporate fraud, including bribery, abuse of office, commercial bribery, illegal remuneration, and other unlawful actions aimed at obtaining personal gain or distorting reporting. All cases of non-compliance with this Policy are considered serious violations and may result in disciplinary, administrative, or criminal liability.

5.5 The Policy establishes the Company's approaches to identifying, assessing, and managing corruption and fraud risks, including issues of interaction with government agencies, management of conflicts of interest, due diligence when working with third parties, and the implementation of effective internal control, monitoring, and incident response procedures.

5.6 The Policy serves as the basis for setting, reviewing, and achieving the Company's goals in the area of anti-corruption and corporate fraud. These goals are formed on the basis of risk analysis, approved by management, implemented at all levels of management, and evaluated using performance indicators.

5.7 The Policy is an integral part of corporate governance and is aimed at ensuring transparency, protecting the interests of shareholders, and strengthening trust among internal and external Stakeholders.

5.8 The Company ensures that anti-corruption requirements are included in all material contracts with third parties.

6. Anti-corruption principles

6.1 The Company is guided by the following basic anti-corruption principles:

6.1.1 **Zero tolerance:** The Board of Directors and the Management Board confirm their unconditional commitment to the principles of integrity and zero tolerance for corruption in all its forms. The Company strictly prohibits any form of corruption and bribery in all business transactions and interactions. No commercial or operational objectives can justify a violation of anti-corruption requirements. All manifestations of corruption will be strictly suppressed and those responsible will be held accountable.

6.1.2 **Invariability of punishment**: The Company guarantees that any corrupt or fraudulent activity, as well as any violation of the requirements of this Policy, will be investigated in a timely and objective manner, and that proportionate and inevitable measures of responsibility will be applied to the guilty parties in accordance with applicable law and the Company's internal documents, regardless of their position, length of service, or other personal qualities.

6.1.3 **Commitment of Senior Management**: Senior Management at all levels demonstrates a zero-tolerance attitude towards corruption by personal example, fosters a culture of ethical behavior, and ensures the creation of an environment in which employees feel safe to report violations.

6.1.4 **Employee involvement**: The Company ensures the active participation of all employees in shaping and maintaining a culture of zero tolerance for corruption by encouraging open dialogue and proactive reporting of any suspicions or facts of violations.

6.1.5 **Risk-based approach**: The Company identifies, assesses, and manages corruption risks based on their likelihood and potential impact, applying control measures proportionate to the level of risk. Anti-corruption measures should be commensurate with the risks identified and should not create excessive barriers to doing business.

6.1.6 **Due diligence:** The Company exercises due diligence in establishing and continuing business relationships with counterparties, hiring employees, and interacting with third parties, verifying their reliability and reputation using procedures appropriate to the level of risk.

6.1.7 **Transparency and accountability**: The Company ensures the openness of its anti-corruption principles, regular reporting on the functioning of the anti-corruption system, and the availability of information to all interested parties. Employees are personally responsible for complying with anti-corruption requirements.

6.1.8 **Protection of applicants from harassment**: The Company guarantees confidentiality and protection from harassment for employees and third parties who report facts or suspicions of corruption in good faith. Such persons shall not be subject to discrimination, persecution, or other negative consequences.

6.1.9 **Continuous improvement**: The Company is committed to continuously improving its anti-corruption management system through regular monitoring of effectiveness, internal audits, management review, and corrective action.

7. Planning of the anti-corruption and corporate fraud prevention system

7.1 Planning of activities in the field of anti-corruption and corporate fraud prevention is carried out on a systematic and risk-oriented basis, taking into account context analysis, assessment of corruption risks, internal and external environmental factors, as well as legislative requirements and international standards.

7.2 The Board of Directors approves the strategic goals and directions for the development of the anti-corruption system for a period of three (3) years, reflecting the Company's priorities in terms of strengthening corporate ethics, enhancing internal control, developing a culture of integrity, and generally improving the effectiveness of compliance and anti-corruption systems. Based on the results of the corruption risk assessment and review of the information provided by the Compliance Service, the Board of Directors also issues separate instructions to eliminate identified deficiencies and reduce risks in specific business processes.

7.3 The Chairman of the Management Board shall annually approve anti-corruption objectives and an annual anti-corruption plan, including the main measures of the anti-corruption program: training and informing employees, internal audits, interaction with subsidiaries, dependent and jointly controlled organizations, development of mechanisms for reporting violations, and improvement of risk assessment procedures.

7.4 In order to assess the effectiveness of the measures implemented in the field of anti-corruption and corporate fraud, the Company uses a system of key performance indicators that correspond to the established goals and objectives of the anti-corruption program. The indicators are developed taking into account the principles of objectivity, measurability, and comparability, covering both preventive measures and response mechanisms. The indicators are monitored on a regular basis by the Compliance Service.

8. Elements of the anti-corruption and corporate fraud prevention system

8.1 The Company conducts a systematic assessment of corruption and corporate fraud risks in all areas of its activities to identify vulnerabilities and develop effective control measures. The assessment is based on a risk-oriented approach and includes an annual comprehensive internal analysis of all corruption risks with the participation of all business units, quarterly updates of the risk register to reflect changes in the business environment, as well as unscheduled analysis in the event of significant changes in activities, organizational structure, introduction of new products and services, entry into new markets, or changes in the regulatory environment.

8.2 The risk analysis process covers all key business processes and functions, including interaction with government agencies, procurement activities, human resources management, financial operations, work with third parties, and others. Risks are classified according to their impact and probability of occurrence using qualitative and quantitative analysis methods in accordance with the Company's internal risk management system documents. The results of the assessment are documented in a consolidated risk register and serve as the basis for the development, implementation, and adjustment of control and mitigation measures, as well as for management decisions on resource allocation and priorities in the area of anti-corruption and corporate fraud.

8.3 The Company analyzes internal and external factors affecting corruption and corporate fraud risks, including organizational structure, business processes, corporate culture, regulatory environment, industry characteristics, and geographic factors. The results of the analysis are used to determine the context in which anti-corruption systems operate and to update risk assessments.

8.4 The Company identifies internal and external Stakeholders that influence the effectiveness of countermeasures or are exposed to relevant risks, and develops differentiated approaches to interaction, taking into account their needs and expectations.

8.5 The Company implements a comprehensive internal control system based on the principles of separation of powers, multi-level authorization, and independent monitoring to prevent corruption violations and corporate fraud at all stages of business processes. The system includes preventive and corrective control procedures that are integrated into operational activities and automated where technically possible and economically feasible.

8.6 The Company develops and maintains a system of policies and procedures detailing requirements for combating corruption and corporate fraud in specific business processes and functional areas. These documents ensure the practical application of the principles of this Policy and include clear instructions, control procedures, distribution of roles and responsibilities, and escalation mechanisms for various situations. All policies and procedures are regularly reviewed for compliance with changes in legislation, business processes, and identified risks, and are communicated to relevant employees through a system of mandatory training and notifications.

8.7 The Company fosters and maintains a corporate culture of zero tolerance for corruption and corporate fraud through systematic communications, educational programs, and the creation of an environment that encourages ethical behavior at all levels of the organization. The anti-corruption culture is based on the personal example of management, open dialogue on ethical issues, recognition and encouragement of ethical behavior, and fair response to violations regardless of the position and status of the violator.

8.8 The communication system includes regularly informing all employees about anti-corruption principles and requirements through corporate communication channels, conducting thematic campaigns and events, and ensuring the availability of up-to-date information on policies, procedures, and changes in anti-corruption legislation. Particular attention is paid to explaining the practical aspects of applying anti-corruption requirements in everyday activities and providing opportunities for consultation on complex ethical issues.

8.9 Educational programs include mandatory basic training for all employees upon employment, regular refresher training at least once a year, as well as specialized programs for employees in high-risk corruption positions and senior management. The training is conducted in various formats, including face-to-face seminars, online courses, practical cases and simulations, with mandatory knowledge testing and documentation of the results. The effectiveness of training programs is regularly evaluated through feedback from participants, monitoring of changes in behavior, and analysis of the dynamics of violations.

8.10 The Company ensures the operation of an accessible, confidential and secure information system on facts or suspicions of corruption and corporate fraud, including multiple communication channels for employees and third parties. The system provides the possibility of anonymous and personal appeals through a hotline, a web portal, e-mail, postal addresses and personal appeals to authorized persons, providing round-the-clock availability and the possibility of submitting messages in the state, Russian and English languages.

8.11 The Company guarantees the confidentiality of the processing of all incoming messages, the protection of applicants' personal data and the non-disclosure of information to persons not involved in the consideration of the application. Special attention is paid to protecting applicants from harassment, discrimination, harassment and other negative consequences associated with reporting violations in good faith, including the application of disciplinary measures to persons who retaliate against applicants.

8.12 The Company ensures comprehensive verification of all facts related to suspected violations using objective, independent and structured procedures. As part of the procedural approach, all incoming messages and data are subjected to an initial analysis in order to confirm their reliability and the validity of suspicions. If signs of possible violations are identified, an internal investigation is initiated aimed at a comprehensive study of the situation, including the collection of evidence, an analysis of the circumstances and causes, as well as an assessment of the consequences.

8.13 Based on the results of the investigation, the Company takes systematic measures aimed at eliminating the identified causes and conditions contributing to violations. Corrective actions include improving internal procedures, strengthening control at the stages of business processes, and introducing additional preventive mechanisms. In parallel, disciplinary measures are applied against the perpetrators, regardless of their position or status.

8.14 The Company implements comprehensive control procedures in cooperation with third parties aimed at reducing corruption risks and ensuring compliance with the requirements of anti-corruption legislation. These procedures include verification of the trustworthiness of counterparties and other business partners, as well as monitoring their compliance with ethical norms and standards of the Company.

8.15 The Company guarantees transparency and honesty in relations with third parties, including the mandatory conclusion of contracts containing anti-corruption clauses. These clauses provide for the obligations of the parties to comply with anti-corruption legislation, the Company's right to terminate the contract in case of violations, as well as reporting requirements for suspicious activities.

8.16 The Company applies a risk-based approach when checking employees for potential corruption risks at all stages of the employment relationship. Special attention is paid to candidates for positions with a high level of involvement in processes subject to corruption risks. Verification may include an analysis of biographical information, information about conflicts of interest, business reputation, connections with third parties, as well as other factors that may affect the employee's integrity. The audit results are used to make informed personnel decisions and form individual control measures. Repeated assessments may be carried out in the event of a change in the area of responsibility, receiving information about possible violations, or at the request of the Company's management.

8.17 The Company carries out an assessment of corruption risks in transactions involving the acquisition of shares, mergers, acquisitions, creation of joint ventures, as well as other forms of investment cooperation. The audit includes an analysis of the anti-corruption culture, the availability and maturity of internal control and compliance systems, the history of violations and interactions with government agencies, as well as the reputation of key individuals and owners. When significant risks are identified, mitigation measures are developed, including the inclusion of special conditions in contracts, additional monitoring or withdrawal from the transaction.

8.18 The Company implements a comprehensive approach to identifying and resolving conflicts of interest, ensuring transparency and preventing situations that could negatively affect the objectivity of decisions. A key element of this approach is the mandatory disclosure of conflicts of interest by all employees, both on a periodic basis and when circumstances arise that could create a conflict of interest. All submitted declarations are carefully analyzed in order to assess the possible impact of a conflict of interest on the actions of employees or the results of their work. If a potential conflict is detected, these circumstances are taken into account when making decisions, including the possibility of changing the composition of participants in the process, redistributing responsibilities, or involving independent experts.

8.19 In order to manage conflicts of interest, the Company develops procedures aimed at systematizing the process of declaring, storing and processing data, as well as monitoring the fulfillment of obligations to prevent conflicts of interest. An important aspect is the control over the giving and receiving of gifts and hospitality.

8.20 The anti-corruption and corporate fraud system is subject to regular review and improvement based on the principles of a risk-based approach and performance analysis. The review is carried out taking into account the dynamics of the external and internal environment, identified shortcomings in the functioning of the system, the results of investigations, audits, monitoring, and feedback from employees and Stakeholders. The Company ensures timely updating of policies, procedures, and control mechanisms to adequately respond to changes in legislation, regulatory practices, business models, and risk levels. The purpose of the review is to maintain the relevance, effectiveness, and sustainability of the anti-corruption system in the context of the changing environment and strategic priorities of the Company.

9 Monitoring, audit and management analysis

9.1 The Company conducts regular internal audits (independent analysis) of the anti-corruption and corporate fraud system in order to assess its effectiveness, efficiency and compliance with the requirements of the internal regulatory framework, legislation of the Republic of Kazakhstan and international standards, including ST RK ISO 37001.

9.2 Internal audit may be carried out by the Company's Internal Audit Service or by a competent third party with the necessary knowledge, experience and level of independence. The audit checks compliance with anti-corruption policies and procedures, the effectiveness of implemented control measures, the completeness of incident response and the reliability of the declared information. Based on the audit results, a documented report is prepared containing recommendations and information on identified inconsistencies. The Company takes corrective measures to eliminate deficiencies, and their implementation is monitored in accordance with the established procedure by the Compliance Service.

9.3 The Company conducts a management analysis of its anti-corruption and corporate fraud prevention system at least once a year. The analysis is initiated and organized by the Compliance Service and conducted in the form of a meeting attended by the Chairman of the Management Board and relevant business units of the Company. The analysis covers the results of internal audits, the degree of implementation of the annual plan, the execution of current activities, as well as the results of work on appeals, internal investigations, the application of corrective measures, and the maintenance of a culture of ethical behavior.

9.4 The analysis allows assessing the relevance of the measures applied, identifying areas for improvement, and determining the directions for the system's development, taking into account changes in legislation and the internal and external environment. The results of the management analysis are documented and used to update policies, procedures, resource allocation, and priorities, and, if necessary, are submitted to the Board of Directors for assessment of the effectiveness of measures taken to prevent corruption and corporate fraud.

9.5 The Compliance Service carries out a systematic assessment and monitoring of the effectiveness of measures to combat corruption and corporate fraud. The assessment covers the degree of implementation of the planned measures, compliance with procedures, practical risk reduction and the development of a culture of integrity. Based on the results of the assessment, recommendations are made to improve the system, and corrective actions are initiated if necessary. The final information on the assessment is brought to the attention of the Board of Directors as part of the reporting on the functioning of the anti-corruption system.

9.6 The Board of Directors supervises the effective functioning of the anti-corruption and corporate fraud prevention system, ensuring its compliance with the Company's strategic objectives and legal requirements. At least once a year, the Compliance Service shall submit to the Board of Directors summary information on the implementation of anti-corruption measures, the results of internal audits and management analysis, identified violations, measures taken, and the state of corporate culture.

9.7 The Company's anti-corruption and corporate fraud prevention system is developed based on the principle of continuous improvement and adaptation to changes in the external and internal environment. The effectiveness of the system may be affected by factors related to changes in legislation, organizational structure, business processes, geography of operations, and the level of employee involvement. In order to respond to such changes in a timely manner, the Company systematically analyzes risks, evaluates the implementation of anti-corruption measures in its business units, draws lessons from identified violations and incidents, and takes into account feedback from employees and third parties.

9.8 The results of internal audit, management analysis, performance monitoring, as well as information on violations and response measures are used to update anti-corruption policies, adjust procedures, reallocate resources, and improve the effectiveness of control mechanisms. The Board of Directors, exercising its supervisory function, reviews the submitted materials and, if necessary, makes recommendations for further development of the system, including strengthening certain areas, introducing new approaches and improving the effectiveness of the entire anti-corruption model in the Company.

10 Roles and responsibilities in the anti-corruption system and corporate fraud prevention system

10.1 The Board of Directors provides overall management of the anti-corruption and corporate fraud system, approves key internal documents, defines strategic guidelines, and oversees the effectiveness of measures taken.

10.2 At least once a year, the Board of Directors reviews information on the functioning of the system, the internal audit report, monitoring results and proposals from the Compliance Service, as well as makes recommendations for its improvement. The Board of Directors also plays a coordinating role in relation to subsidiaries and dependent organizations, ensuring a uniform standard of anti-corruption behavior. As part of its responsibility, the Board of Directors ensures that the resources necessary for the functioning of the system are sufficient.

10.3 The Chairman of the Management Board organizes the implementation of the system at the operational level. It approves goals and plans to combat corruption and corporate fraud, makes decisions on corrective actions, reviews reports on the progress of programs and assignments, and ensures the development of a culture of ethical behavior. At the initiative of the Compliance Service, a management analysis of the system is conducted with the participation of the Chairman of the Management Board, which examines key aspects of the implementation of anti-corruption measures and makes the necessary management decisions. The Chairman of the Management Board ensures the provision of resources, including personnel, financial, organizational and technical, for the effective implementation of anti-corruption measures and the fulfillment of the tasks of the Compliance Service.

10.4 The Compliance Service performs the functions of the methodological and operational center of the anti-corruption system. It organizes risk assessment, develops and coordinates the implementation of plans and measures, monitors the effectiveness of the system, informs the Board of Directors and the Chairman of the Management Board about the results, initiates management analysis and participates in the formation of corrective and preventive measures. The Compliance Service has independence, direct access to Senior Management, and the necessary authority and resources to carry out its tasks. The Company guarantees the absence of conflicts of interest and unjustified interference in the activities of the Compliance Service.

10.5 The Heads of the Company's business units are responsible for implementing the provisions of this Policy in their fields of activity, integrating anti-corruption and corporate fraud procedures into business processes, participating in risk assessment and implementing corrective measures. They ensure that subordinate employees comply with the requirements of anti-corruption legislation and internal procedures, and are also required to promptly inform the Compliance Service of possible violations. The Heads of the Company's business units contribute to the formation of a culture of intolerance to corruption and organize the participation of their employees in training and communication on ethics and integrity issues.

10.6 The Company's employees are required to comply with the provisions of this Policy, participate in training events, follow established procedures, and faithfully report facts or suspicions of corruption and corporate fraud. Each employee is personally responsible for ethical behavior, compliance with legislation and principles established by the Company. The contribution of the Company's employees to the maintenance of the anti-corruption and corporate fraud system is an important element of the overall corporate culture.

10.7 Specific powers, procedures for the performance of functions, as well as the order of interaction between the participants of the system are determined by the internal documents of the Company.

11. Miscellaneous

11.1 The Company's Compliance Service ensures that all employees of the Company are required to familiarize themselves with this Policy when applying for a job, as well as when making changes to it. All employees of the Company sign a commitment to comply with the standards of this Policy, in accordance with Annex 2 to this Policy, which is stored in the employee's personal file.

11.2 Employees of the Company who are persons equivalent to persons authorized to perform public functions and defined by the Law of the Republic of Kazakhstan “On Anti-Corruption,” shall assume anti-corruption restrictions by signing a statement of acceptance of anti-corruption restrictions, in accordance with Annex 3 to this Policy, which shall be kept in the personal files of such employees.

11.3 The Policy is translated into Kazakh (the official language), English and other languages as necessary to ensure understanding. The Company's employees are trained in accordance with the Policy provisions at least once a year as part of the professional development and compliance culture development system.

11.4 The Company ensures wide accessibility of this Policy for all Stakeholders. The Policy is published on the Company's official website, posted in the corporate information system, and made available upon request. The Company consistently implements the principle of transparency, ensuring access to its anti-corruption obligations for shareholders, investors, business partners, government agencies and Company as a whole.

11.5 Issues not regulated by this Policy are governed by the applicable legislation of the Republic of Kazakhstan, international obligations, including the UK Anti-Bribery Act (where applicable), as well as the Company's internal documents.

12 Enactment procedure

12.1 This Policy is put into effect in accordance with the decision of the Board of Directors of NAC Kazatomprom JSC, and in terms of the established requirements for planning and reporting provided for in Sections 7-10 of this Policy, dated January 1, 2026.

12.2 This Policy is being introduced to replace the Policy of NAC Kazatomprom JSC on Anti-Corruption and Corporate Fraud, approved by the decision of the Board of Directors of NAC Kazatomprom JSC dated August 24, 2023 (Minutes No. 9/23).

13 Annexes

13.1 Annex 1. Anti-corruption standard of NAC Kazatomprom JSC.

13.2 Annex 2. The form of the obligation to comply with the Policy of NAC Kazatomprom JSC on anti-corruption and corporate fraud.

13.3 Annex 3. Anti-Corruption Undertaking Form

Annex 1
(mandatory)

Anti-corruption standard of NAC Kazatomprom JSC

1 The Anti–Corruption standard of NAC Kazatomprom JSC (the Company) was developed in accordance with paragraph 2 of Article 10 of the Law of the Republic of Kazakhstan "On Anti-Corruption".

2 The Anti-Corruption Standard is aimed at achieving an atmosphere of intolerance to any manifestations of corruption in Company by creating a system of value and moral anti-corruption guidelines for employees of the Company in the exercise of their official functions.

3 Sphere of public relations: extraction, processing and sale of minerals and products.

4 The principles of anti-corruption standards are:

1) legality;

2) transparency;

3) ethics;

4) respect for the rights and legitimate interests of individuals and legal entities and their protection from corruption;

5) avoiding conflicts of interest.

5 Anti-corruption standards define the following standards of conduct for the Company's employees:

1) be guided by the principle of legality, the requirements of the Constitution, laws and other regulatory legal acts of the Republic of Kazakhstan and the legislation of other countries applicable to the Company's activities, strictly comply with anti-corruption legislation;

2) ensure the observance and protection of the rights, freedoms and legitimate interests of individuals and legal entities;

3) prevent actions capable of discrediting Company;

4) report to the immediate supervisor or to the Compliance Service on the occurrence of a conflict of interest, personal interest in the performance of official duties, on their inducement by third parties or other employees of the Company to corrupt behavior and receiving gifts;

5) not to be guided by personal and (or) selfish interests in the performance of official duties;

6) refrain from contacting colleagues and supervisors with unlawful requests that violate the established order of relationships, which may affect the adoption of an impartial official decision;

7) not to incite other employees to commit corruption offenses and not to encourage such actions;

8) do not accept gifts in connection with the performance of official duties that may lead to a conflict of interest;

9) not to use official or other information that is not subject to dissemination in order to obtain or extract property and non-property benefits and advantages;

10) refuse to be appointed to a position if it is related to direct subordination or control to persons who are in close kinship and family relationships *(parents (parent), children, adoptive parents, adopted children, full- and half-siblings, grandparents, grandchildren, spouse, full-siblings and incomplete siblings, parents and children of the spouse);*

11) be active in combating corruption and uncovering corruption offenses;

12) immediately report to the management, or to the Compliance Service, or – in accordance with the procedure established by the legislation of the Republic of Kazakhstan – to the state body

authorized to carry out anti-corruption work on known facts of corruption, including inducement to obtain any benefit for expedited consideration of materials or facts of red tape;

13) immediately inform the immediate supervisor or the Compliance Service in writing about doubts about the legality of the order received for execution;

14) contact the higher management, the Compliance Service, or use the available communication channels and means of communication of the Company provided for by the Confidential Information Policy of NAC Kazatomprom JSC, or – in accordance with the procedure established by the legislation of the Republic of Kazakhstan – to the state body authorized to carry out anti-corruption work if the direct manager is involved in a conflict of interest;

15) support and require colleagues to adhere to a high legal anti-corruption culture;

16) take measures on an ongoing basis to eliminate the causes and conditions of possible conflict of interest, corruption offenses and their consequences;

17) refrain from assisting anyone in carrying out entrepreneurial and/or other income-generating activities;

18) refrain from representing or lobbying the interests of third parties, as well as performing actions on their behalf;

19) do not use the means of material, technical, financial and information support, as well as other state property and official information for non-official purposes.

6 Managers at all levels need to deal with their subordinates:

1) prevent cases of recruitment and placement of personnel based on kinship, fraternity and personal loyalty, to ensure compliance with the principles of meritocracy;

2) accurately determine the tasks and scope of official powers of subordinate employees;

3) prevent uneven distribution of the workload between employees who are subordinate;

4) show fairness and objectivity in evaluating the performance of subordinates, as well as the use of incentives and penalties;

5) do not give subordinates orders that are clearly impossible or beyond the scope of their official duties, as well as orders that contradict the law;

6) do not use one's official position to influence the activities of subordinates when dealing with non-official matters;

7) not to force subordinate employees to commit corruption offenses;

8) prevent and suppress violations of anti-corruption legislation by subordinates and other employees;

9) take timely and comprehensive measures to resolve conflicts of interest that have arisen with a subordinate employee in the course of performing its official duties;

10) take comprehensive measures to prevent corruption;

11) eliminate the causes and conditions that contribute to the commission of corruption offenses by subordinates;

12) do not involve subordinates to perform off-duty or personal tasks;

13) set an example to subordinate employees by its impeccable behavior;

7 Managers at all levels ensure compliance with this Anti-Corruption Standard and organize anti-corruption work among their subordinates.

Annex 2
(required)

Form

**Commitment to comply with
the provisions of the Anti-Corruption and Corporate Fraud Policy of NAC Kazatomprom JSC**

I, ____

confirm that I am aware of the provisions of the Anti-Corruption and Corporate Fraud Policy of NAC Kazatomprom JSC and undertake to comply with them.

I am aware that, in accordance with the Policy, all employees of NAC Kazatomprom JSC, including myself, are prohibited, directly or indirectly, personally or through the mediation of third parties, from participating in corrupt activities, including offering, giving, promising, requesting or receiving bribes and payments to simplify formalities in any form, including in the form of funds, valuables, services and other benefits, to any persons and from any persons or organizations, including commercial organizations, government agencies, Kazakhstani civil servants, private structures and their representatives.

I undertake to inform my direct manager, the Compliance Service of NAC Kazatomprom JSC, or through confidential information channels about information I have about upcoming, committed, or ongoing corruption offenses, as well as suspicions about the legality or ethics of my actions, as well as actions, omissions, or suggestions from other employees, contractors, or other persons who cooperate with NAC Kazatomprom JSC.

I am aware of the possibility of disciplinary, administrative, civil, and/or criminal liability for violating anti-corruption legislation and the Policy.

If I have any additional questions about the principles and requirements of the Policy and applicable anti-corruption legislation, I can contact the Compliance Service of NAC Kazatomprom JSC or my direct manager.

Annex 3
(mandatory)

Form

Chairman of the Management Board
NAC Kazatomprom JSC

from____
full name

____
job title

Anti-Corruption Undertaking

Hereby, in accordance with the Law of the Republic of Kazakhstan "On Anti-Corruption", I undertake anti-corruption restrictions on:

1) inadmissibility of joint service (work) of close relatives, spouses and relatives[1];

2) the use of official and other information not subject to official disclosure for the purpose of obtaining or extracting property and non-property benefits and advantages;

3) acceptance of gifts due to the performance of official duties in accordance with the legislation of the Republic of Kazakhstan[2]. I also undertake to notify my family members [3]of similar anti-corruption legislation requirements;

4) participation in gambling and/or betting in gambling establishments that fall under the definition provided by the Law of the Republic of Kazakhstan "On Gambling Business," as well as participation in gambling and/or betting in places not designated for this purpose or in gambling and/or betting conducted through the use of telecommunications networks, including the Internet. [4]

I am aware of the liability established by the current legislation of the Republic of Kazakhstan for failure to adopt anti-corruption restrictions and non-compliance with them.

Date _________________
Signature _____________

[1] **Joint work** involves holding positions that are directly subordinate to positions held by close relatives, spouses, and/or relatives by marriage, as well as holding positions in the same governing body (supervisory board, executive body) of a quasi-public sector entity.
Close relatives are understood to mean parents (parent), children, adoptive parents (adoptive parents), adopted children (adopted child), full and half-siblings, grandparents, grandchildren, and relatives are understood to mean full and half-siblings, parents and children of a spouse.

[2] **The procedure for handling gifts** is established by Article 12 of the Law "On Anti-Corruption." For detailed explanations, please contact the Compliance Service.

[3] **Family members** are understood to be spouses, parents, children, including adult children, and dependents who live together permanently.

[4] **Bet** - a risk-based agreement concluded between participants or with a gambling business operator on the outcome of an event involving a win in which they do not participate.
Gambling - a risk-based agreement involving a win, concluded between participants or with the organizer of a gambling business on the outcome of an event in which the specified persons participate.