

Information Disclosure Policy
of joint stock company "National atomic company "Kazatomprom"

1. Purpose

This Information Disclosure Policy (the "**Policy**") shall define key goals, principles, forms, ways and procedure of information disclosure of the Company.

2. Scope

This Information Policy (hereinafter – the Policy) shall cover all types of the Company's activity. The document shall be binding on all structural units, officials and employees, as well as other interested parties of the Company.

3. General Provisions

3.1. The Policy has been developed in compliance with the laws of the Republic of Kazakhstan, the Company's Charter, the Company's Corporate Governance Code, applicable listing requirements of the local and international stock exchanges, and other internal Company documents.

3.2. Internal procedures of information disclosure under this Policy shall be defined by internal documents, approved in accordance with the Company's Articles of Association.

3.3. This Policy shall not regulate relations connected with the treatment of information constituting state secrets.

3.4. Information security shall comprise a part of this Policy, and it shall be ensured through fulfilling the following tasks:

- ensuring the integrity of the Company's information assets to keep a high quality of its business processes;
- ensuring constant access to information assets of the Company to maintain its business processes;

- ensuring confidentiality of information of the Company and other parties during the work with information technologies.

3.5. The Company's information security shall be regulated by the Information Security Policy approved by the Company's Management Board.

3.6. The list, ways and procedure of inside information disclosure shall be regulated by the Internal control over insider information of «NAC «Kazatomprom» JSC Rules.

3.7. The list, ways and procedure of information that is required to be published on the Internet resource of the depository of financial statements, as well as in periodicals, shall be regulated by the NAC Kazatomprom JSC information disclosure in mass media Rules approved in accordance with Articles of Association of the Company.

3.8. The list, ways and procedures of disclosing other information shall be regulated by the applicable listing requirements of the local and international stock exchanges where the Company's securities are listed and by the NAC Kazatomprom JSC information disclosure in mass media Rules approved in accordance with Articles of Association of the Company.

4. Terms and definitions

1. **Shareholder** – individual (person/company) that owns share(s)
2. **Official** – a member of the Board of Directors, a member of the Management Board;
3. **PR** – Company's Public Relations Department;
4. **Interested parties** – include but are not limited to shareholders, directors, creditors and potential investors of the Company, professional participants of the securities market, public organizations, mass media, state bodies within the limits of their competence established by legislative acts of the Republic of Kazakhstan, employees of the Company, and other persons whose interests are directly affected by the activities of the Company;
5. **Confidential information** – information that does not relate to state secrets, but which has real or potential commercial value due to the unknown to its third parties (including information restricted by the dissemination of which is dictated by official necessity), free access on a legal basis to which has a limited circle persons, and the Company takes measures to protect its confidentiality;
6. **Inside information** – as defined in Internal control over insider information of «NAC «Kazatomprom» JSC Rules;
7. **Company** – a joint stock company "National Atomic Company "Kazatomprom";
8. **Company's bodies** – Annual general meeting (AGM), Board of directors, Management Board;
9. **Submission of comments** – submission of answers to oral and written requests made by representatives of mass media;
10. **Disclosure of information** – ensuring access to information to all concerned parties regardless of the purpose of such information obtaining, in the manner, by the ways and in the forms prescribed by the laws of the Republic of Kazakhstan, the Company's Articles of Association, Corporate Governance Code, applicable listing requirements and other internal documents;

11. **Mass media** – periodic printed publication, radio and TV channels, documentary films, audiovisual record or other form of periodic or continuous public distribution of information including internet-resources;
12. **IR** – Company’s Investor Relations Unit;
13. **Securities of the Company** – any securities of the Company that are being traded or are admitted to trading on a stock market, or any securities that may be converted into such securities;

5. Policy Aims

The Company shall disclose information for the following purposes:

- full exercising of rights of the shareholders for getting information in the manner prescribed by the laws of the Republic of Kazakhstan, Company’s Articles of Association, applicable listing requirements;
- ensuring transparency of the major aspects of the Company’s activity to interested parties;
- confirmation of the Company’s readiness to comply with the standards of due corporate governance;
- creation and keeping the positive image of the Company.

6. Policy principles

To implement the Policy, the Company shall be governed by the following principles:

transparency - observance of this principle ensures complete and accurate Disclosure of important, substantial and relevant information, as well as access to documents.

availability - the Company shall provide free, easy and cost effective access to disclosed information for the interested parties;

balance - ensuring a reasonable balance of information disclosure and transparency on the one hand, and confidentiality, on the other, for the purpose of maximizing the Interested parties’ rights to receive information, but subject to strict observance of the Company's interests in restricting access to information constituting state, official and commercial secrets of the Company;

information protection - prevention of material and non-material damage as a result of violation of the order of information disclosure and (or) transfer;

consistency - disclosed information shall be consistent in all material respects with previously disclosed information on the same or related subjects;

reinforcement by documents - disclosed information should be based on supporting documents and real events;

efficiency – ensuring that information is disclosed to the market and/or interested parties as soon as possible;

equality - ensuring equal rights and opportunities in obtaining information for all Interested parties, except as otherwise prohibited by applicable law and internal documents of the Company;

completeness – providing information without hiding any facts, that is material and necessary for Interested parties to create full opinion about true situation;

objectivity - when highlighting its activities, the Company shall not avoid negative information that is material for Interested parties;

information resources protection – Company’s right to use all legitimate methods to protect and control Confidential and Inside Information;

regularity - consistent and systematic disclosure of material information to the market and Interested parties;

relevance - disclosed information shall be relevant to the Company’s activities;

reliability - providing Interested parties with information without distorting the facts known to the Company; and

connectivity - disclosed information should be compiled and presented using consistent approaches and principles to enable objective analysis in chronological order.

7. Policy Implementation

7.1. To implement the Policy the Company shall:

- keep records of information (data), disclosure of which is compulsory according to the requirements of the laws, Company’s Articles of Association, Corporate Governance Code, applicable listing requirements and other internal documents;

- set a procedure for information disclosure;

- define a list of data constituting the Company’s confidential information, the disclosure (transfer, leakage) of which may prejudice the Company’s interests, and shall specify the required measures the observance of which will provide confidential information protection;

- set up a control system over distribution of information about the Company through determination of methods, forms and procedure for distribution of information, and determination of persons responsible for preparation and distribution of information to be disclosed;

- define the competence and responsibility of the Company's bodies, officials and employees for proper disclosure of information about the Company and confidential information protection;
- develop a unified information space to create conditions for implementation of this Policy which will allow monitoring the information transferred through information and communication technologies whether inside or outside the Company.

7.2. At the request of the shareholder, the Company is obliged to provide him/her with copies of documents stipulated in Article 80 of the Law of the Republic of Kazakhstan "On Joint Stock Companies" and the Company's Charter. The fee charged by the Company for providing copies of documents is established by the Company and cannot exceed the cost of expenses for their production and delivery to the shareholder. The Company is obliged to provide the required information (copies of the requested documents) within 10 (ten) calendar days from the date of the shareholder's request in compliance with the laws of the Republic of Kazakhstan and other internal Company documents.

7.3. Within the framework of increasing the investment attractiveness, the Company strives to maintain a constant direct dialogue with shareholders, investors, analysts, basing its work on the basic principles of the Company's Corporate Governance Code, by providing additional information, explanations and official comments on the current state of affairs in the Company, financial analysis of the Company's activities, and making informed investment decisions.

7.4. Certain information for shareholders and investors, including presentations, certain financial and operational information at the discretion of the Company, is posted on the Russian- and English-language versions in the Investors page of the Company website www.kazatomprom.kz.

8. Methods and forms of information disclosure

8.1. Forms of information disclosure shall be defined by the Company so that to provide free and reasonable access of all persons concerned to the information disclosed.

8.2. Information about the Company may be disclosed using the following methods:

- 1) publication of information in mass media;
- 2) placing of statements on the Company's web site;
- 3) placing of statements on Internet resource of the depository of financial statements (www.dfo.kz), as well as through authorized regulatory services and/or bodies of local and international stock exchanges where the Company's securities are listed;
- 4) placing of statement in periodical(-s), stipulated in the Company's Articles of Association;
- 5) interview, press conferences, meetings with shareholders and other interested parties and public events;
- 6) organization of visits to the Company by investors, analysts, media representatives;
- 7) provision of access to information (documents) and circulation of their copies to interested parties upon their due and legal request; and
- 8) other ways prescribed by the laws of the Republic of Kazakhstan.

8.3. Company may use other methods, channels and formats of communication with shareholders and interested parties:

- 1) Investor Day and Analyst Day;
- 2) group and individual meetings "one on one", as with the personal presence of representatives of the Company, as using remote channels;
- 3) international investment conferences;
- 4) road shows, presentations, site visits;
- 5) audio conference calls;
- 6) regular calls/replies to inquiries by e-mail.

8.4. The Company should use its website as much as practicable to give the public access to:

- public announcements;
- the key corporate information required under statute and the applicable listing rules;
- Company presentations (where appropriate);
- Company contacts; and

corporate governance documentation relating to the Board of Directors.

9. Disclosure of Information about the Decisions made by the Board of Directors

9.1. The list of issues contained in the decisions made by the Board of Directors the information of which shall be brought to the attention of the shareholders is given in Annex hereto, in the manner, by the ways and in the forms prescribed by the laws of the Republic of Kazakhstan, the Company's Articles of Association, Corporate Governance Code, applicable listing requirements and this Policy;

9.2. The manner and terms of bringing the information specified in the Annex hereto to the attention of the shareholders and other interested parties of the Company shall be defined in accordance with the laws of the Republic of Kazakhstan and the Rules of Information Disclosure in Mass Media approved in accordance with Company's Articles of Association, applicable listing requirements and other Company's internal documents.

9.3. If the issue in the decision of the Board of Directors is confidential, then for the purpose of commercial interests protection, information contained in the decision made shall not be published.

9.4. In case the issue in the decision of the Board of Directors contains any confidential data, then information contained in this decision shall be published to a limited extent without disclosing confidential data.

10. Right for Information Disclosure

10.1. Only the Company's authorized persons within their competence shall have the right to disclose the information and submit comments on behalf of the Company.

10.2. Chairman of the Company's Board of Directors shall have the right to make official comments on the decisions made by the Board of Directors, as well as state an opinion of the Board of Directors on issues raised at the meetings of the Board of Directors taking into account the requirements to preserve state, official, commercial or other secrets protected by the legislation of the Republic of Kazakhstan and by the Company.

10.3. Chief Executive Officer shall have the right for public address on the issues related to the Company's activity. In the manner prescribed by the Company's internal documents, the Chief Executive Officer shall have the right to delegate to the Company's employees the right for public address (information presentation) on behalf of the Company.

10.4. Head of IR shall have a right to provide existing public information. All investor related inquiries are to be referred to the Head of IR as the first point of contact.

10.5. PR Director shall have the right to provide the existing public information, the purpose of which will be to inform the public about the activities of the Company through interaction with the media. All media related inquiries about activities of the Company are to be referred to the PR Director as the first point of contact.

11. Protection of Confidential Information

11.1. The Company shall ensure protection of confidential information according to requirements of laws of the Republic of Kazakhstan and the Company's internal documents. Terms of access to such information, as well as the possibility of its obtaining shall be specified by the Company with due account for the need to comply with the balance between the Company's transparency and effort not to prejudice its interests.

11.2. The list of documents and information constituting the Company's confidential information shall be defined by the corresponding internal document approved in accordance with Company's Articles of Association.

11.3. Company's officials and employees shall be obliged to use confidential information only for the Company's benefit and according to this Policy and other Company's internal documents. Company's counterparties shall be obliged to use confidential information which has come known to them according to legislation, other regulations and agreements of the Company.

11.4. To ensure the due use of confidential information by the Company's officials, employees and counterparties, the Company shall have the right to introduce special procedures aimed at protection of confidential information from illegal use thereof. The procedures shall be introduced to:

- provide compliance with due use of confidential information, including through elimination of illegal access to confidential information and its use by the Company's officials and employees and third parties in contradiction to the interests of the Company;
- increase a level of confidence to the Company on the part of the Sole Shareholder, investors and partners.

11.5. In case of any violations of the laws of the Republic of Kazakhstan, Company's Articles Association, this Policy and internal documents in the process of information disclosure that caused damage to the Company, the guilty persons may be brought to responsibility in the manner prescribed by the laws.

12. Final provisions

12.1. The issues which are not regulated by this Policy, shall be regulated by the laws of the Republic of Kazakhstan, Company's Articles of Association, resolutions of the AGM and the Board of Directors, and internal documents approved in a set order.

12.2. In case of any changes made in the applicable laws of the Republic of Kazakhstan and the Company's Articles of Association, if either clause hereof comes into conflict therewith, this Policy shall be applied to the extent not contradicting the applicable laws of the Republic of Kazakhstan and the Company's Articles of Association.

The list of issues in the decisions made by the Board of Directors of NAC Kazatomprom JSC, information on which shall be brought to the attention of the shareholders and investors

1. Placement (sale) of the Company's shares, including the amount of the placed (sold) shares within the amount of declared shares, the way and price of their placement (sale).
2. Repurchase of the outstanding shares or other securities and the price of their repurchase.
3. Determination of the terms for issue of bonds and derivatives of the Company and making decisions on their issuance;
4. Opening and closing of foreign branches and representative offices.
5. Determination of the quantitative composition, terms of powers of the Company's Management Board, election of its members and termination of their powers, as well as appointment and early termination of powers of the Chief Executive Officer.
6. Conclusion of large deals.
7. Conclusion of non-arms' length transactions on the following issues
 - Raising loans, provision of loans / financial aid / guarantees / warranties to the amount constituting twenty or more percent of the total booked value of the Company's assets. In case of placement information on this issue, date of decision of the Board of Directors, counteragent, amount and term of transaction shall be specified;
 - Sale and purchase of natural uranium to the amount of twenty or more percent of the total booked value of the Company's assets. In case of placement information on this issue, date of decision of the Board of Directors, scope, amount and terms of transaction shall be specified;
 - Other non-arms' length transactions to the amount of twenty or more percent of the total booked value of the Company's assets.
8. Acquisition (disposal) by the Company of ten or more percent of shares (participatory interests in the charter capital) of other legal entities to the amount comprising ten or more percent of the total amount of the booked value of the Company's assets.
9. Decision about the Company's participation in opening of other legal entities to the amount of ten or more percent of the total booked value of the Company's assets.
10. Pledge (repledge) of the Company's property to the amount of ten or more percent of the Company's assets value.