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Approved by the resolution
of the Board of Directors
of PCLL “KMG Kashagan B.V.”
dated October “18” 2024.


Policy on Conflict-of-Interest Management in the PCLL «KMG Kashagan B.V.»

Astana, 2024.

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1. General Provisions and Basic Concepts


1.1. This Policy on Conflict-of-Interest Management in the PCLL «KMG Kashagan B.V.» (hereinafter - the Policy) is developed in accordance with the norms of international anti-corruption law, the Law of the Republic of Kazakhstan «On Combating Corruption», other legislative acts of the Republic of Kazakhstan, the Policy to Combat Fraud and Corruption in PCLL «KMG Kashagan B.V.» and other internal documents of the Company.

1.2. This Policy defines the main goals and objectives of Conflicts of Interest management in PCLL «KMG Kashagan B.V.» and its Branch in the Republic of Kazakhstan (hereinafter - the Company), participants of the process, their tasks, functions, authorities and responsibilities, as well as the principles and stages of Conflicts of Interest management.


1.3. The provisions of the Policy shall apply to the Employees of the Company irrespective of their position. Employees of the Company shall familiarize themselves with the principles and recommendations of the Policy and comply with them. The rules of the receiving party shall apply to seconded employees of the Company.

2. Terms and Abbreviations

Term Abbreviation	Definition
Affiliates	Individuals or legal entities that have the ability to directly and/or indirectly determine decisions and/or influence decisions made by each other (one of the persons), including by virtue of a concluded transaction
Close relatives	Parents (parent), children, adoptive parents, adopted, full-and half-blood siblings, grandfather, grandmother, grandchildren
Hotline	The line providing an opportunity to report issues requiring special attention that may have an adverse impact on the Company's operations and performance
Business Ethics	A set of ethical principles and norms of business communication, which the Employees of the Company are guided by in their activities
Company	The Private company limited Liability «KMG Kashagan B.V» and its Branch in the Republic of Kazakhstan
Confidential or Inside Information	1) information related to production, technological, managerial, financial and other activities of the Company, disclosure (transfer) of which may cause damage (losses) to the interests of Company and/or 2) any information generated or used within the framework of the North Caspian Project, except for information that is publicly available or published in publicly available sources of information, and/or 3) information that is confidential in accordance with the internal acts of the Company.
Competitor	an individual, individual entrepreneur or legal entity that renders services (performs works, sells goods) similar to the services (works, goods) rendered (performed, sold) to the Company

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Counterparty	an individual or legal entity, except for Employees, with whom the Company has entered into or plans to enter into a contract/agreement (e.g., service/work/supply agreement, agency agreement, contract for the sale of oil, gas, oil products, assets of a Company, etc.).
Final Beneficiary	an individual who directly or indirectly owns more than twenty-five percent of shares in the authorized capital or outstanding (less preferred and redeemed by the company) shares of a legal entity, or who exercises control over the organization in any other way
Conflicts of Interest	a conflict between official duties and private interests of an Employee of the Company, where his/her personal interest affects or may affect the impartial performance of his/her official duties and/or functions
Corporate Culture	values, principles, norms of behavior and attitudes specific to the Company
Personal Interest/Private Interest	possibility for an Employee to receive income in the form of money, valuables, other property or services of a proprietary nature, other property and non-property rights for himself/herself or third parties, not provided for by the internal documents of the Company, while performing his/her official duties
Negative Consequences of Conflict of Interest	material or non-material damage caused to a Company or a third party, expressed qualitatively or quantitatively
Politically Exposed Person	<p>1) Civil servant - a citizen of the Republic of Kazakhstan, holding a public position in a state body and exercising official powers for the purpose of realization of tasks and functions of the state, paid from the republican or local budgets or from the funds of the National Bank of the Republic of Kazakhstan in accordance with the procedure established by the laws of the Republic of Kazakhstan;</p> <p>2) Official - a person who permanently, temporarily or by special authority performs the functions of a representative of authorities or performs organizational, administrative or administrative and economic functions in state bodies;</p> <p>3) Foreign official - an official of a foreign state, including members of a foreign public assembly, officials of international organizations, members of an international parliamentary assembly, judges of a foreign state and officials of an international court, as well as officials in the armed forces and other military formations of a foreign state</p>
Procurement Procedure	an internal document of the Company regulating the procedure for planning, organizing and conducting procurement of goods, works and services on a paid basis in order to ensure its activities
Employee	1) a person who has an employment relationship with the Company and directly performs work under an employment contract or as part of secondment; 2) a person engaged on the basis of an employment contract concluded with the seconding party under a personnel services agreement (outsourcing)

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In-Law Relatives	full and half siblings, parents and children of the spouse
Conflict of interest Management	creation of mechanisms to prevent situations in which the Employee's interests may affect the objectivity and independence of his/her decision-making and performance of duties, as well as conflict with his/her obligation to act in the interests of the Company and/or its shareholders
Resolution of Conflict of Interest	actions by appropriate authorities and/or persons able and authorized to make management decisions that result in the avoidance of Adverse Consequences of a Conflict of Interest that is likely to occur or has occurred

3. Goals and Tasks

3.1. The purpose of this Policy is to create a uniform system of managing Conflicts of Interest in the Company, as well as to define the requirements to the behavior of Employees, compliance with which will ensure fair and unbiased performance of their official duties (or duties within any bodies, committees, commissions, etc.) and impartial decision-making.

3.2. The objectives of this Policy are:

3.2.1. creating conditions to prevent, identify and eliminate Conflict of Interest;

3.2.2. resolution of Conflict of Interest using measures of this Policy in the interests of the Company and its shareholders in accordance with the laws of the Republic of Kazakhstan and internal documents of the Company;

3.2.3. defining procedures for disclosing information on potential Conflicts of Interest, mechanisms for making management decisions and norms of behavior of Employees under existing Conflicts of Interest;

3.2.4. fostering an appropriate performance culture that ensures timely identification and resolution of Conflict of Interest;

3.2.5. developing a set of effective measures to identify, record and monitor conflicts of interest;

3.2.6. ensuring compliance with the rights of shareholders, as well as protection of property interests and business reputation of the Company;


3.2.7. continuous further improvement of the procedures for preventing Conflict of Interest in the Company in accordance with changing realities.

4. Policy Principles

4.1. Priority of interests of the Company:

4.1.1. Employees of the Company shall make decisions and take other actions guided by the laws of the Republic of Kazakhstan, interests of the Company and disregarding considerations of personal gain. The decision-making process should not be influenced by the religious, professional, political, ethnic, family or other personal preferences, motives and tastes of the decision-maker;

4.1.2. Employees of the Company shall avoid such activities as a private citizen which may provide him/her undue advantage at the expense of Inside Information obtained/received

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in the course of his/her official duties;

4.1.3. Employees of the Company shall not seek or accept any benefits in exchange for someone's expected performance or non-performance of official duties or functions;

4.1.4. Employees of the Company shall not improperly take advantage of a previous position or position within the Company, including the use of Inside Information obtained while in a former position.

4.2. Personal Responsibility and Example:

4.2.1. Employees of the Company shall at all times act in such a manner as to set an example of good character for other Employees of the Company;

4.2.2. Employees of the Company accept responsibility for identifying and resolving Conflicts of Interest in favor of the Company, if any.

4.3. Developing an office culture that is intolerant of conflicts of interest:

4.3.1. Employees of the Company shall establish and implement management and executive policies, procedures and management approaches that will encourage effective control and Management of Conflict of Interest;

4.3.2. Organizational procedures shall encourage disclosure and discussion of Conflict-of-Interest situations by the Employees of the Company and shall include reasonable measures to protect disclosed information related to Conflict of Interest from misuse by others;

4.3.3. Employees of the Company should inform the Compliance Officer of a Conflict of Interest, either through the Hotline, by sending an e-mail to mail@sk-hotline.kz or by calling 8-800-080-47-47.

5. Types of Conflicts of Interest

5.1. A Conflict of Interest may include the following situations:

5.1.1. Use of Confidential, Inside Information for personal purposes:

- the Employee directly or indirectly engages in transactions using Confidential, Inside Information for personal gain;

- the Employee uses any Confidential, Inside Information (including, but not limited to personal information, trade secrets) accessed by Employee in connection with the performance of job duties for Personal Benefit;

- transfer to third parties of Internal Information of the Company or any Confidential Information (including personal data of the Employees and representatives of the Company's Counterparties, commercial secrets).

5.1.2. Exceeding official powers and neglect of official duties:

- combination of executive and supervisory functions by the Employee, allowing him/her to use his/her job duties for Personal Benefit;

- Employee's exceeding his/her powers or abuse of powers for Personal Benefit;

- hindering one Employee in the performance of job duties by another Employee, including for the purpose of Personal Benefit;

- involvement in the decision-making process of determining their own remuneration;

- participating in or influencing, directly or indirectly, a business decision, process or transaction in the course of the Company's activities where personal interests would conflict with the interests of the Company;

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- participation for profit or other Personal benefit in a transaction in which the Company is one of the parties unless such participation has been first approved in writing by an authorized body.

5.1.3. Acting as an Employee within the perimeter of the Company:

- hiring or changing an Employee's job responsibilities, which would place the Employee and the Employee's Close Relative, spouse, In-Law Relatives in direct command and make any personnel decisions regarding the Close Relative, spouse, In-Law Relatives (including deciding on salary changes, assigning bonuses, assigning certain job functions, promotions, etc.);

- appointment or election of the Employee, which will result in the Employee making any personnel decisions with respect to the Employee's Close Relative, spouse, In-Law Relatives;

- working or performing functions with Close Relatives, spouses, In-Law Relatives in the same collegial body of the Company.

5.1.4. Conflict of Interest in Procurement Procedures:

- a legal entity is involved in the process regulated by the Procurement Procedures in which the Employee participating in the process regulated by the Procurement Procedures has legal entity ;

- in the process regulated by the Procurement Procedures, a legal entity in which a Close Relative, spouse, In-Law Relatives of the Employee participating in the process regulated by the Procurement Procedures or a close relative, spouse, In-Law Relatives of such Employee who has influence on decision-making or has an interest in the authorised/share capital of such legal entity is employed.

5.1.5. Employment and Business Activity:

- appointment to an executive position, election or appointment to the management body of the Counterparty and/or the Competitor while retaining the current position in the Company. This provision also applies to Close Relatives, Spouses, In-Law Relatives, unless the Employee has timely informed the Employee of the existence of a Conflict of Interest;

- participation of the Employee, as well as their Close Relatives, spouses, In-Law Relatives in the activities of the Counterparty, which implies the Employee's preference for the interests of one Counterparty to the detriment of the interests of another Counterparty for the purpose of obtaining Personal Benefit and/or the Employee's preference for his/her own interests to the detriment of the interests of the Counterparty for the purpose of obtaining Personal Benefit;

- a conflict between the interests of the Company and the interests of other legal entities or individual entrepreneurs in which the Employee is the Ultimate Beneficiary. Due to employment in the operation of said legal entity or participation/ownership in another legal entity, it is not possible for the Employee to perform his/her duties for the Company in good faith;

- competition with Company, including, without limitation, competition on any business transactions and investment projects;

- provision of services by Employees to Counterparties, part-time work for Counterparties, except for North Caspian Operating Company N.V., organizations belonging to the group of «Samruk-Kazyna» JSC, KMG;

- entering into contracts with former Employees, as well as with legal entities with which the former Employees are affiliated, if less than 2 (two) years have passed since the termination

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of labor relations with such Employee;

- investing in any company with which the Company does business if the Employee or its affiliates influence decision-making in such company.

5.1.6. Interaction with Politically Exposed Persons

- personal interest in interaction with Politically Exposed Persons within the framework of the Employee's official duties in the Company.

5.2. The list given in clause 5.1. of the Policy is not exhaustive. Employees of the Company shall independently assess the existence of a Conflict of Interest in other situations as well.

5.3. When the Compliance Officer identify Conflicts of Interest that are not included in the list in clause 5.1. but meet the definition of “Conflict of Interest”:

- 1) an appropriate notice shall be given to the Employee;
- 2) the identified Conflict of Interest shall be resolved in accordance with Section 8 of the Policy.

6. Conflict of Interest Disclosure Requirements

6.1. In the event of a Conflict of Interest, the Employee shall promptly and fully disclose information about the Conflict of Interest and actively contribute to its resolution.

6.2. The Employee shall refer information about Conflicts of Interest to the Compliance Officer. In case of doubt as to the presence / absence of a potential or actual Conflict of Interest, Employees should contact the Compliance Officer for clarification.

The Compliance Officer shall, for this purpose, keep a log for registering and maintaining information on conflict of interest in each structural unit in the form according to Annex No.1 (hereinafter - “Registration Log”).

6.3. In doing so, the Company undertakes to:

6.3.1. maintain the confidentiality of the process of disclosing a Conflict of Interest and the Conflict-of-Interest resolution process

6.3.2. protect the Employee from harassment in connection with the Conflict of Interest;

6.3.3. that was timely disclosed and resolved by him or her;

update the Registration Log on a regular basis.

6.4. Disclosure of Conflicts of Interest must be made by the Employee in writing and in a manner that is as clear as possible.


6.5. The Compliance Officer shall send the Registration Log to KMG's Chief Compliance Officer for review and approval on a quarterly basis (if KMG has such a requirement).

6.6. Compliance Officer may maintain a registration log using internal document management systems, Microsoft Office.

6.7. The Compliance Officer is responsible for working on compliance issues with North Caspian Operating Company N.V.

7. Conflict of Interest Disclosure Procedure

7.1. The following procedure for disclosure (declaration) of Conflict-of-Interest cases in

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Employees is established:

7.1.1. Initial disclosure of the Conflict of Interest by Employees at the time of hiring (filling out an application in the form of Annex No.2);

7.1.2. Disclosure of a possible Conflict of Interest upon appointment and assumption of a new position by the Employee and change of circumstances (filling out a statement in the form of Annex No.4 in the event of a Conflict of Interest or in the form of Annex No. 3 in the absence of a Conflict of Interest);

7.1.3. Annual completion by Employees of a Form on the presence/absence of a Conflict of Interest (filling in a statement in the form of Annex No.4 in case of a Conflict of Interest or in the form of Annex No.3 in case of absence of a Conflict of Interest);

7.1.4. One-time disclosure of Conflict of Interest as situations arise that give rise to a new actual or potential Conflict of Interest or as circumstances change, including in the case of any services rendered by Employees to Contractors, Conflict of Interest among members of the Contract Board in the course of procurement procedures (in accordance with the form of Annex No.4);

7.1.5. Each Employee signs in the journal of familiarization with this Policy in accordance with the form of Annex No. 5.

7.2. If the Employee's circumstances change and the Conflict of Interest no longer exists, this change shall be recorded by the Compliance Officer in a Registration Log in the form as per Annex No.1 to the Policy.

8. Measures on Conflict-of-Interest Management

8.1. Information on the existence of a real or potential Conflict of Interest of Employees shall be verified by the Compliance Officer in order to assess the seriousness of the risks arising for the Company.

8.2. The Compliance Officer shall immediately report any identified Conflict of Interest to the Head of the Branch in order to select the most appropriate form of conflict resolution.

8.3. To resolve a Conflict of Interest, a committee shall be formed, which may include all interested parties - Employees of the Company. The composition of the Commission shall determined by the Compliance Officer in consultation with the General Director of the Branch.

8.4. In each specific case of resolution of a Conflict of Interest, different conflict resolution measures may be determined by agreement between the Company and the Employee who disclosed the Conflict of Interest:

8.4.1. exclusion (permanently or temporarily) from participation in the discussion and decision-making process on matters that are or may be influenced by a Conflict of Interest;


8.4.2. limiting access to specific information for the Company Employee involved in the Conflict of Interest;

8.4.3. reviewing and changing the scope of duties and labor functions of the Employee;

8.4.4. transfer of the Employee, with his/her consent, to a position providing for the performance of labor functions not related to the Conflict of Interest;

8.4.5. written waiver by the Employee of the Private Interest that creates a conflict with the interests of the Company;

8.4.6. termination of a contract with a counterparty in which the Employee has a Private

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Interest, and a moratorium on renegotiation of the contract with the counterparty for one year if the Employee ceases to own or be the Ultimate Beneficiary of the counterparty;

8.4.7. dismissal and/or termination of the labor contract of the Employee of the Company in accordance with the procedure established by the laws of the Republic of Kazakhstan.

8.5. The Company shall have the right to terminate the labor contract for violation of the requirements of the Law on Combating Corruption of the Republic of Kazakhstan, as well as for violation of this Policy (in cases where there are relevant provisions in the labor contract) in the manner prescribed by the Law.

8.6. If, as a result of the resolution of a Conflict of Interest, the Employee ceases to own or be the Ultimate Beneficiary of a Counterparty or Competitor, and if, as a result of such action, the Conflict of Interest may be deemed to have been resolved, the Employee shall disclose the absence of the Conflict of Interest on the form set forth in Annex No.3.

8.7. This list of measures for resolving Conflict of Interest is not exhaustive.

8.8. Employees performing their job duties shall put the interests of the Company above their Private Interests and shall be guided solely by its interests when resolving business issues. The decision-making process should not be influenced by the religious, ethnic, political, family or other personal preferences and motivations of the decision-maker. Not all personal interests, relationships, influences or actions automatically create a Conflict of Interest. Employees shall use good judgment in taking into account all relevant requirements of this Policy.

8.9. The Company shall have the right, at its sole discretion, to prohibit certain Conflicts of Interest among its Employees if such conflicts pose a significant risk to the interests or reputation of the Company and if such prohibitions are not contrary to the Laws of the Republic of Kazakhstan and (if applicable) the laws of the countries where Company is registered and/or does business.

8.10. Employees are permitted to invest directly or indirectly in any organization with which the Company does business, so long as the Employee and/or its affiliates do not influence the decision-making of such organization.

9. Monitoring of Conflicts of Interest Register

9.1. The Compliance Officer shall regularly monitor and review the Conflicts of Interest Register. Verification may be carried out in the following ways, subject to compliance with the Law:


9.1.1. examination of documents and information on procurement activities to identify signs of Conflict of Interest;

9.1.2. verification of information on the ownership chain of potential counterparties, including information on the Ultimate Beneficiary;

9.1.3. verification of the information provided in the Conflict-of-Interest Declarations in the manner prescribed in this Policy;

9.1.4. systematic monitoring of mass media and other sources and timely response to any negative information about the Company;

9.1.5. other ways and methods stipulated by organizational and administrative documents of KMG Group companies and not contradicting the laws of the Republic of

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Kazakhstan or other applicable laws.

10. Responsibilities

10.1. The Compliance Officer is responsible for implementing and explaining the provisions of this Policy to the Employees of the Company, as well as monitoring the effectiveness of the implementation of the requirements set forth in this Policy.

10.2. Responsibility for compliance with the requirements of this Policy shall be assigned to each Employee regardless of position.

10.3. Employees are personally responsible for timely identification of conflicts of their personal interests with the interests of the Company, timely declaration of the Conflict of Interest, as well as for active participation in the resolution of actual or potential Conflict of Interest.

10.4. The Company considers concealment or/and deliberately untimely or incomplete disclosure of a Conflict of Interest as an abuse of trust and deception. Failure to comply with the provisions of the Policy may be considered as a disciplinary offense and serve as a basis for bringing the Employee to disciplinary responsibility.

10.5. Employees are fully responsible for dealing with matters relating to their Private Interests in such a way as to avoid, as far as possible, Conflicts of Interest arising out of their appointment or subsequent tenure.

10.6. Employees shall at all times act in a manner that exemplifies good and ethical behavior for other Employees and actively support the implementation of the Policy.

10.7. Employees shall mitigate any consequences of a Conflict of Interest, including, if applicable, minimizing loss or indemnification of the Company.

10.8. The Company shall have the right to certify its Employees for awareness and compliance of their actions with the provisions of this Policy and business ethics standards adopted in the Company.


10.9. The Company guarantees that no Employee will be held liable or otherwise adversely affected by the Company's initiative in connection with complying with the requirements of this Policy or reporting potential or occurring violations of the Policy.

11. Final Provisions

11.1. This Policy shall become effective upon approval.

11.2. If the laws are amended and the provisions of this Policy come into conflict with the laws, such provisions of the Policy shall not apply, and the provisions of the laws that take precedence over the provisions of this Policy shall apply.

12. Regulatory references

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Item No.	Document Title
1	Law of the Republic of Kazakhstan “On Combating Corruption” dated 18.11.2015, No.410-V ZRK
2	Counterparty Due Diligence Policy of PCLL «KMG Kashagan B.V.»
3	Regulations on Proactive Reporting in the Branch of PCLL «KMG Kashagan B.V.» in the RoK
4	Law of the Republic of Kazakhstan “On Combating Corruption” dated 18.11.2015, No. 410-V ZRK

13. Documents and Records

Item No.	Document Record Title	Document Record Identification Number
1	Form of the Register of Information on Identified Conflicts of Interest in KMGK PCLL	
2	Initial Disclosure of Potential Conflict of Interest	
3	Statement of Absence of Conflict of Interest	
4	Disclosure of Potential Conflicts of Interest upon Assuming New Position and Change of Circumstances	
5	Conflict of Interest Policy Familiarization Sheet	

Annex 1.

Form of Registration Log of Information on Identified Conflicts of Interest in PCLL «KMG Kashagan B.V.»/the Branch


Item	Full Name, of Employee, Department	Description of Conflict of Interest	Date of notification of Conflict of Interest	Date of resolution of Conflict of Interest (if applicable)	Resolution status (Details/Form of Resolution of Conflict of Interest)	Employee's signature	Signature of Immediate Supervisor

Responsible Person (“Approved”):

(Full Name, position, signature)

Compliance Officer (“Approved”):

(Full Name, signature)

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Annex 2.

INITIAL DISCLOSURE OF POTENTIAL CONFLICT OF INTEREST

_____, 20____.

Astana

1. Information on securities issued by the Counterparties:

Types of securities: share, bond, promissory note, Eurobond, corporate bond, stock, derivative financial instrument (note, option, futures, forward, etc.).

I hereby disclose information about my intention and/or the intention of my Close Relatives/Spouse/In-Law Relatives to purchase securities issued by the Counterparties:

Item No.	Name of Nominee Holder/Owner, place of securities safekeeping	Type of Securities	Issuer	Quantity (pcs.)

2. Information on beneficial ownership/shareholding and management in companies - Counterparties / Competitors of the Branch of PCLL «KMG Kashagan B.V.» :

The name of the legal entity (Counterparty/Competitor) in which I and/or my Close Relatives/Spouse/In-Law Relatives am (are)/ am (are) expected to be owners/ultimate beneficiaries and/or management. The intention to acquire any assets/shares in legal entities that may become objects of interests of the PCLL «KMG Kashagan B.V.»/ Branch shall also be indicated.

The amount of participation in KZT (and/or in other currency) as of the date of the Application with the indication of the share in the total capital of the legal entity shall be indicated.

Item No.	Name of legal entity	Amount of participation	Currency of participation

3. Information on participation in the sole and collegial bodies of the Counterparties or the PCLL «KMG Kashagan B.V.»/Branch :

The name of the legal entity in the bodies of which the applicant and/or his/her Close relative/spouse/In-Law Relative participates or acts as an official shall be indicated

The type of participation shall be indicated (participation in the Supervisory Board, participation in the Board of Directors, participation in the Management Board, Sole executive body¹, etc.).

¹ Sole executive body

Item No.	Name of legal entity	Type of participation

4. Links with Politically Exposed Persons

4.1. I hereby notify of any personal interest / possible / arising / existing conflict of interest / connection with Politically Exposed Persons (please underline as necessary):

Item No.	Possible Conflict of Interest (<i>describe the conflict of interest / personal interest</i>)

4.2. I hereby notify that I or my Close Relatives/spouse/In-Law Relatives are/were Politically Exposed Persons (1. specify the full name of the Close Relative, position, place of work, period of employment; 2. specify your previous positions, places of work, period of employment).

Item No.	Full Name of Close Relative/Applicant	Position	Place of work	Period of employment


5. Other disclosures

5.1. I hereby notify that I or my Close Relatives/spouse/In-Law Relatives intend to acquire assets owned by PCLL «KMG Kashagan B.V.» , KMG and/or its subsidiaries and affiliates:

Item No.	Full Name of Close Relative/Applicant	Assets

5.2. I hereby notify on the provision of services/other interaction with the Counterparties of the PCLL «KMG Kashagan B.V.»/ Branch:

Item No.	Counterparty	Type of interaction (e.g., provision of any services)

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5.3. I hereby notify that my following Close Relatives/Spouse/In-Law Relatives have been employed or appointed to a position in the PCLL «KMG Kashagan B.V.»/ Branch :

Item No.	Full name of Close Relative/Spouse/In-Law Relative	Position held by the Close Relative/Spouse/In-Law Relative


I hereby certify that all information provided in the application is complete, true and correct.

Full Name, position, name of unit

Signature: _____

Compliance Officer ("Reviewed"):

(Full Name, signature)

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Annex 3.

STATEMENT OF ABSENCE OF CONFLICT OF INTEREST

_____, 20____.

Astana

I hereby certify that:


- ☐ I have no conflict of interest/personal interest that affects or may affect the impartial performance of my job duties;
 - ☐ I do not own personally, as well as through affiliated persons, ownership interest / shares of organizations - competitors of the PCLL «KMG Kashagan B.V.»/ Branch ;
 - ☐ I do not use corporate property, information or official position for personal gain or to compete with the PCLL «KMG Kashagan B.V.»/ Branch;
 - ☐ I do not abuse my official position to obtain personal benefits that may arise from activities, including but not limited to activities related to sales or procurements of the Branch of PCLL «KMG Kashagan B.V.» , sale and purchase of assets, investment of funds of the PCLL «KMG Kashagan B.V.»/ Branch and so on;
 - ☐ I am not a director, shareholder, partner, affiliate or otherwise related person of the Counterparty of the PCLL «KMG Kashagan B.V.»/Branch in the Republic of Kazakhstan;
 - ☐ I perform my job duties in strict compliance with the Regulations on the Branch, the Code of Business Ethics, the Conflict of Interest Policy in the PCLL «KMG Kashagan B.V.»/ Branch in the Republic of Kazakhstan and other internal documents of the PCLL «KMG Kashagan B.V.»/Branch in the Republic of Kazakhstan;
 - ☐ I have informed about all my family ties to Politically Exposed Persons;
- I have informed about all my previous positions as a Politically Exposed Person;
- ☐ I undertake to give immediate notice if a potential conflict of interest arises.

Full Name, position of the Applicant, name of the unit

Signature: _____

Compliance Officer ("Reviewed"):

(Full Name, signature)

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Annex 4.

DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST UPON ASSUMING NEW POSITION AND CHANGE OF CIRCUMSTANCES

_____, 20____.

_____ city

I hereby declare a potential conflict of interest.

1. Information on securities issued by the Counterparties:

Types of securities: share, bond, promissory note, Eurobond, corporate bond, stock, derivative financial instrument (note, option, futures, forward, etc.).

I hereby disclose information about my intention and/or the intention of my Close Relatives/Spouse/In-Law Relatives to purchase securities issued by the Counterparties:

Item No.	Name of Nominee Holder/Owner, place of securities safekeeping	Type of Securities	Issuer	Quantity (pcs.)

2. Information on beneficial ownership/shareholding and management in companies - Counterparties / Competitors of the Branch of PCLL «KMG Kashagan B.V.» :

The name of the legal entity (Counterparty/Competitor) in which I and/or my Close Relatives/Spouse/In-Law Relatives am (are)/ am (are) expected to be owners/ultimate beneficiaries and/or management. The intention to acquire any assets/shares in legal entities that may become objects of interests of the PCLL «KMG Kashagan B.V.»/ Branch shall also be indicated.

The amount of participation in KZT (and/or in other currency) as of the date of the Application with the indication of the share in the total capital of the legal entity shall be indicated.

Item No.	Name of legal entity	Amount of participation	Currency of participation

3. Information on participation in the sole and collegial bodies of the Counterparties or Competitors of the PCLL «KMG Kashagan B.V.»/ Branch:

The name of the legal entity in the bodies of which the applicant and/or his/her Close relative/spouse/In-Law Relative participates or acts as an official shall be indicated.

The type of participation shall be indicated (participation in the Supervisory Board, participation in the Board of Directors, participation

in the Management Board, Sole executive body², etc.).

Item No.	Name of legal entity	Type of participation

4. Links with Politically Exposed Persons

- 4.1. I hereby notify of any personal interest / possible / arising / existing conflict of interest / connection with Politically Exposed Persons (please underline as necessary):

Item No.	Possible Conflict of Interest (<i>describe the conflict of interest / personal interest</i>)

- 4.2. I hereby notify that I or my Close Relatives/spouse/In-Law Relatives are/were Politically Exposed Persons (1. specify the full name of the Close Relative, position, place of work, period of employment; 2. specify your previous positions, places of work, period of employment).

Item No.	Full name of Close Relative/Spouse/In-Law Relative of the Applicant	Position	Place of work	Period of employment

5. Other disclosures

- 5.1. I hereby notify that I or my Close Relatives/spouse/In-Law Relatives intend to acquire assets owned by PCLL «KMG Kashagan B.V.», KMG and/or its subsidiaries and affiliates:

Item No.	Full name of Close Relative/Spouse/In-Law Relative of the Applicant	Assets

- 5.2. I hereby inform about the provision of services/other interactions with the Contractors:

² Sole executive body

Item No.	Counterparty	Type of interaction (e.g., provision of any services)

5.3.I hereby inform of the occurrence of a conflict of interest in the tender procedure

Item No.	Tender Procedure	Descriptions of Conflicts of Interest in a Tender Procedure

5.4. I hereby notify that my Close Relatives/Spouse/In-Law Relatives have been employed or appointed to a position in the PCLL «KMG Kashagan B.V.»/ Branch:

Item No.	Full name of Close Relative/Spouse/In-Law Relative	Position held by the Close Relative/Spouse/In-Law Relative


I hereby certify that all information provided in the application is complete, true and correct.

Full Name, position, name of unit

Signature: _____

Compliance Officer ("Reviewed"):

(Full Name, signature)

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Annex 5.

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to the Conflict-of-Interest Management Policy of the Branch of PCLL «KMG Kashagan B.V.» in the Republic of Kazakhstan

_____, 20____ city

CONFLICT OF INTEREST POLICY

FAMILIARIZATION SHEET OF THE PCLL «KMG KASHAGAN B.V.»/BRANCH

EMPLOYEES OF THE PCLL «KMG KASHAGAN B.V.»\ BRANCH IN THE REPUBLIC OF KAZAKHSTAN

By signing this Familiarization Sheet, Employees acknowledge that they have read and understood all clauses of this Policy and that all necessary explanations have been received.

Full Name, POSITION OF THE APPLICANT, NAME OF THE UNIT

SIGNATURE
