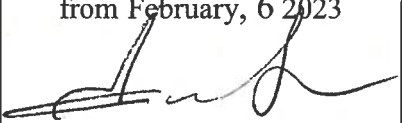
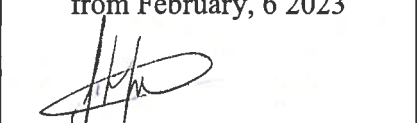
 КазМунайГаз <small>NATIONAL COMPANY "ҚАЗМУНАЙГАЗ"</small>	JSC NC “KazMunayGaz”	
Document name:	Information Disclosure Policy of JSC NC “KazMunayGaz”	
Document type: Policy	KMG-VND-4611.1-28	page 1 of 5
Developed by: A.A. Zhakenov from February, 6 2023 	Reviewed by: M.A. Dikanbaev from February, 6 2023 	Approved by the Resolution of JSC NC “KazMunayGaz” Management Board dated <u>March 10</u> , 2023, Minutes No. <u>12.</u>

1. General Provisions

1.1. This Information Disclosure Policy of JSC NC “KazMunayGaz” (hereinafter referred to as the Company) has been developed in accordance with the current legislation of the Republic of Kazakhstan, the Charter of the Company, regulatory documents of Stock Exchanges, and other applicable regulatory documents.

1.2. The purpose of the Policy is to establish the Company’s information activity philosophy and procedure, in respect of, inter alia, disclosure of reliable information about the Company to stakeholders, and a procedure for use of insider and confidential information in compliance with applicable legal and regulatory requirements.

1.3. In its activities, the Company commissioned itself to ensuring transparency and maintaining an ongoing direct dialogue with stakeholders through disclosure of information regarding activities of the Company and provision of additional information, explanations and official comments in respect of the actual status of the Company’s activities as well as other information as necessary for an analysis of the Company’s activities.

Timely and most complete disclosure of reliable information about the Company’s activities it to promote creating the Company’s good image, increasing the value of its assets, attracting investments as well as confirming the Company’s commitment to meeting the high corporate management standards.

In its information activities, the Company complies with the requirements of the legislation of the Republic of Kazakhstan, the applicable listing requirements of Stock Exchanges, the Charter of the Company, applicable regulatory documents of the Fund, as well as other Company’s internal documents, including, inter alia, in respect of insider information management, non-disclosure of confidential information, and other secrets protected by the legislation of the Republic of Kazakhstan.

1.4. The Company’s Information Activity Philosophy consists in:

Regularity — Constant and systematic provision of information about the Company to stakeholders.

Accessibility — Employment of information sharing methods providing free, easy and least expensive access by stakeholders to the disclosed information.

Equality — Ensuring equal rights and opportunities in obtaining information by stakeholders, with the exceptions envisaged by the legislation of the Republic of Kazakhstan and the Company’s internal documents.


Completeness — Provision of information and facts which are essential and necessary for full apprehension by stakeholders of the actual status of activities, excluding confidential information.

Availability of Supporting Documents — The information disclosed must be based on documents and real events.

Objectivity — When sharing information about its activities, the Company discloses, inter alia, negative information about its activities significant for stakeholders.

Consistency — The information disclosed by the Company must be consistent in all material aspects with the information previously disclosed in respect of similar or interrelated matters.

Transparency — Disclosure of complete and reliable information to stakeholders.

 КазМұнайГаз <small>NATIONAL COMPANY ҰЛТТЫҚ КӨМЕРАҚАРСЫМ</small>	Information Disclosure Policy of JSC NC “KazMunayGas”	
Policy	KMG-VND-4611.1-28	page 2 of 5

Balance — Ensuring a reasonable balance of information disclosure and transparency on the one hand, and confidentiality on the other, in order to maximize use by shareholders and other stakeholders of their rights to obtain information, but subject to strict compliance with the Company’s interests.

Protection of Information — Prevention of material and non-material damage that could result from violation of the information disclosure and/or sharing procedures.

Protection of Information Resources — The right of the Company to use all legal methods and means to protect confidential and insider information.

Relevance — Information disclosed by the Company must be relevant to the Company’s activities.

Reliability — Provision of information to stakeholders with no distortion of the facts known to the Company.

Connectedness — Information disclosed by the Company must be prepared using identical presentation approaches and principles to enable its use and analysis in chronological order.

Continuity — The Company’s commitment to long-term communication with stakeholders.

1.5. This Policy is subject to posting in the Kazakh, Russian and English languages on the corporate website of the Company.

1.6. This Policy is not applicable to relations involving circulation of information classified as state secret. The procedure for circulation of information classified as state secret is regulated by applicable legislation of the Republic of Kazakhstan and other Company’s internal documents.

1.7. The Policy reflects requirements of the legal framework and regulatory documents of Stock Exchanges as of the date of its adoption. If, resulting from changes in the legislation or regulatory documents of Stock Exchanges, certain clauses of the Policy become contradicting thereto, such clauses shall become void. Before introducing changes to the Policy, it is required to observe the applicable legislation as well as requirements included in regulatory documents of Stock Exchanges.

2. Scope of Application

2.1. This Policy applies to the Company’s information activities and:

Establishes a system to control sharing of information about the Company through information sharing procedure, methods and forms, as well as appointing persons responsible for preparation and sharing of information;

Establishes fundamental principles enabling control of information shared via information and communication channels both within and outside the Company;

Establishes a procedure for insider information disclosure and provision of confidential information to stakeholders.

2.2. The Policy is mandatory for application by all structural units, officials and employees as well as other persons recognized as insiders of the Company in terms of insider information disclosure.


3. Abbreviations and their definitions

IR — Department for relations with investors of the Company;

SDE — Subsidiaries and dependent entities, including jointly controlled entities and joint ventures owned by the Company;

Officials — Members of the Board of Directors and the Management Board of the Company as well as other persons authorised, based on the law or other legal act or a document of the Company, to act on behalf of the Company;

Stakeholders — Shareholders, directors, creditors, and potential investors of the Company, professional securities market players, public organizations, mass media, governmental bodies within their capacity established by legislation of the Republic of Kazakhstan, as well as employees of the Company and other persons whose interests are directly affected by the Company’s activities. Stakeholders are identified as per the list of the Company’s stakeholders;

 КазМұнайГаз <small>NATIONAL COMPANY ҰЛТТЫҚ КӨМІРЛІК ҚОҒАМЫ</small>	Information Disclosure Policy of JSC NC “KazMunayGas”	
Policy	KMG-VND-4611.1-28	page 3 of 5

Insider Information — Any reliable and accurate information that directly or indirectly relates to the Company and is not publicly available, which disclosure may significantly affect the Company Securities market value as well as its respective financial assets;

Insider — persons who have access to insider information, determined in accordance with the Company's Internal Control Rules to delimit the rights of access to insider information and prevent the possibility of misuse of such information by insiders;

Information Activity — Activity aimed at providing stakeholders with information about the Company in accordance with principles and provisions of this Policy;

Confidential Information — information that constitutes proprietary information of limited distribution, a trade or business secret, having actual or potential commercial value because of being unknown to third parties, which is freely accessible on a legitimate basis, and/or which disclosure may create competitive disadvantages for the Company, as well as personal data and other information protected by the legislation of the Republic of Kazakhstan. The list of Confidential Information is to be approved by a resolution of the authorised body in accordance with the Charter and other Company's internal documents;

Media Office — A structural unit of the Company that coordinates, within its competence, with Mass Media communications related to public disclosure of the Company's activities;

Disclosure of Information — Timely public disclosure of information about the Company's activities, to the extent, in the manner, and using methods and forms as established by the legislation of the Republic of Kazakhstan, the Charter of the Company, applicable rules of Stock Exchanges and other Company's internal documents;

Board of Directors — The Company's Board of Directors;

Mass Media — Periodical printed matter, television and radio channels, documentary films, audiovisual recordings and other forms of periodic or continuous public sharing of information, including Internet resources;

Fund — Samruk-Kazyna JSC;

Stock Exchanges — Kazakhstan Stock Exchange and Astana International Exchange;

Company Securities — Any securities of the Company traded or quoted on the stock market or any securities convertible into such securities.

4. Responsibilities

4.1. Officials, heads of functional and structural units, and employees of the Company are responsible for compliance with the requirements of this Policy as well as other Company's internal documents related to implementation of this Policy.

4.2. Insiders shall be responsible, as envisaged by legislation of the Republic of Kazakhstan, for violation of legislation of the Republic of Kazakhstan related to insider information and this Policy.

4.3. The Company may require the insiders convicted of using, disclosing, sharing or other handling of insider information, to indemnify the Company for the damage done to it via their illegal activities.


4.4. Persons who obtained, disclosed and (or) used confidential and (or) insider information through illegal methods are liable in accordance with the legislation of the Republic of Kazakhstan, as well as the internal regulations of the Company. The Company also has the right to demand compensation for damage caused in accordance with the legislation of the Republic of Kazakhstan.

5. Information Disclosure Methods and Forms

5.1. Information about the Company may be disclosed via the following methods and forms:

5.1.1. Publication is Mass Media

5.1.2. Publication of information on the Company's corporate website, via corporate accounts, social networks and internal resources of the Company

 КазМұнайГаз <small>NATIONAL COMPANY ЖҰРТТЫҚ КОМПАНИЯСЫ</small>	Information Disclosure Policy of JSC NC “KazMunayGas”	
Policy	KMG-VND-4611.1-28	page 4 of 5

5.1.3. Interviews, press releases, press conferences, briefings and meetings of authorised persons of the Company with stakeholders

5.1.4. Publication of information on the Financial Statements Depository website as well as via authorised regulatory offices and/or bodies of Stock Exchanges

5.1.5. Organizing visits of investors, analysts and Mass Media representatives to the Company premises

5.1.6. Publication of the Company’s financial statements required by International Financial Reporting Standards, its annual reports, sustainability reports, financial and production results

5.1.7. The Company’s Securities Prospectus.

5.2. For communication with shareholders and other stakeholders, the Company may also use the following methods:

5.2.1. Audio/video conference calls, including those related to the Company’s financial and production results for the reporting period

5.2.2. The Investor’s Day and the Analysts’ Day

5.2.3. Group and/or individual meetings, both with personal presence of the Company’s representatives, and using remote communication channels

5.2.4. International investment conferences

5.2.5. Roadshows, presentations, visiting production facilities

5.2.6. Provision of written answers as per established procedure and by e-mail, as well as verbal comments by telephone.

5.3. Forms and methods of sharing information about the Company’s activities are not limited to the list in clauses 5.1. and 5.2 above, and the Company may disclose information about its activities using other methods not contradicting the applicable legislation and the requirements of Stock Exchanges.

5.4. The Company is obliged to store insider information on the corporate website for at least five (5) years after disclosure.

5.5. The right to make public and official statements, speeches, interviews and comments on all matters related to the Company’s activities, is vested in the Company’s officials as well as the head of the Media Office in consultation with the Company’s Chief Executive Officer.

5.6. The subject matter and content of public speeches, including in Mass Media, regarding issues related to the Company’s activities must be pre-agreed with the Media Office, the IR, and other structural units as per established procedure.


5.7. The Company Employees not authorised to make public statements may not interact with third parties (including Mass Media) outside such employees’ official duties or make public comments regarding the Company’s and SDEs’ activities.

6. Disclosure of Information to Shareholders and Investors

6.1. The Company provides shareholders and other stakeholders with information about the Company’s activities and corporate events, including resolutions of the Company’s Board of Directors, in accordance with the procedure and within the time limits required by the legislation of the Republic of Kazakhstan, applicable listing requirements of Stock Exchanges, the Charter of the Company, this Policy, and other Company’s internal documents.

6.2. Other insider information, for which no disclosure time limits are established by the legislation of the Republic of Kazakhstan and/or the rules of Stock Exchanges, is subject to disclosure by the Company as soon as possible or with a delay as and when prescribed by the Company’s internal documents.

6.3. Upon request of a shareholder, the Company shall provide to such shareholder copies of documents as required by the Law of the Republic of Kazakhstan *On Joint-Stock Companies*, in accordance with the procedure and within the time limits as required by the Charter of the Company.

 КазМұнайГаз <small>NATIONAL COMPANY ҰЛТТЫҚ КӨМЕРТӨС</small>	Information Disclosure Policy of JSC NC “KazMunayGas”	
Policy	KMG-VND-4611.1-28	page 5 of 5

6.4. Since the Fund is the Company’s majority shareholder, the Company, in compliance with the Sovereign Wealth Fund Law of the Republic of Kazakhstan, shall establish internal business processes (business planning, asset management, lending, investment activities, risk management, etc.) in accordance with policies, guidelines and corporate standards duly approved by the Fund in respect of organizations within Fund’s Group. The Company shall provide to the Fund reports on the Company’s activities in accordance with the procedure and within the time limits required by internal documents of the Fund and the Company, including insider and confidential information, subject to the requirements established by this Policy, the Company’s internal documents and other applicable regulatory documents/agreements.

7. Provision of Confidential and Insider Information

7.1. The Company shall protect confidential and insider information in the manner prescribed by the legislation of the Republic of Kazakhstan, this Policy and other Company’s internal documents.

7.2. The conditions for access to confidential and/or insider information, as well as the eligibility to obtaining of such information shall be determined by the Company, subject to the need to maintain the balance between the Company’s openness and the aim not to cause damage to its interests.

7.3. Access to the Company’s confidential information may be granted to third parties subject to the confidentiality provisions and a relevant agreement in order to support the Company’s activities and the Company’s compliance with the requirements of the legislation.

7.4. When preparing information for disclosure (press releases, correspondence with third parties, presentations, etc.), the Company’s structural units shall, in accordance with the Company’s internal documents, determine whether such information is confidential. Public disclosure of confidential information shall be prohibited. Disclosure of confidential information in public access is prohibited, except in cases and in the manner provided for by the legislation of the Republic of Kazakhstan, the Charter of the Company, regulatory documents of Stock Exchanges and other applicable regulatory documents.

8. Final Provisions

8.1. Matters not regulated by this Policy shall be duly governed by the current legislation of the Republic of Kazakhstan, the Charter of the Company, the regulations of Stock Exchanges, and other applicable regulatory documents.

8.2. If, resulting from changes in the current legislation of the Republic of Kazakhstan, the Charter of the Company, regulatory documents of Stock Exchanges, certain clauses of this Policy become contradicting thereto, this Policy shall apply to the extent that it is not in contradiction to the current legislation of the Republic of Kazakhstan, the Charter of the Company, and the regulatory documents of Stock Exchanges.